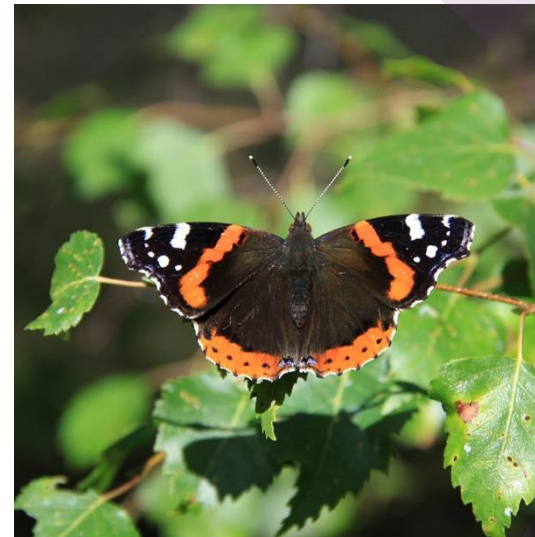


City of York Local Plan - Sustainability Appraisal

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



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2	Final	06/06/19





Non-Technical Summary

Purpose of this report

This Non-Technical Summary (NTS) provides an overview of this June 2019 Sustainability Appraisal Report Addendum – Proposed Modifications Consultation.

The Council, with support from Wood Environment and Infrastructure Solutions UK Ltd¹ (Wood), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft and published a SA Report alongside the consultation Local Plan in February 2018². 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.

The Council is now proposing a number of modifications to the draft Local Plan linked to updates to the evidence base in terms of updated housing needs, HRA and the Green Belt. The Council are consulting on these proposed modifications in the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019). Some of these proposed modifications are the same as the proposed changes submitted with the Local Plan in May 2018 or supersede the changes submitted with the draft Local Plan. Others are newly identified.

The purpose of this addendum is to assess the likely significant effects of the proposed modifications to the draft Local Plan contained within the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019) to update the previous SA as appropriate and to ensure that all the likely significant effects of the Local Plan (as proposed) have been identified, described and evaluated. This report should be read in conjunction with the City of York Local Plan: Publication Draft - Sustainability Appraisal Report (February 2018) and City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (April 2018) which can be accessed through the Council's website:

https://www.york.gov.uk/downloads/download/4337/local_plan_submission_documents_1.

The following sections of this NTS:

- provide an overview of the City of York Local Plan Publication Draft;
- summarise the key housing needs, HRA and Green Belt evidence;
- describe the approach to undertaking the SA of the Local Plan Publication Draft;
- set out how the screening of the proposed modifications was carried out;
- summarise the findings of the screening of proposed modifications; and
- set out the next steps.

What is the Local Plan Publication Draft?

The new Local Plan for the City of York 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:

¹ 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.

² Amec Foster Wheeler and City of York Council (February 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report





- 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 2013³. In 2013 the Council published the Local Plan Preferred Options, which set out the preferred approach to development in the City of York area. Following further refinement, a Publication Draft Local Plan was prepared by Council officers and reported to the Local Plan Working Group (LPWG) and Executive in September 2014. A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken. Following further technical work related to housing and employment growth, the Preferred Sites Consultation was published in 2016. This was revised in light of sub-national housing projections, which affected the underlying baseline evidence in relation to housing need, and sites being brought forward for release by the Ministry of Defence in 2016 leading to the consultation on the Local Pre-Publication Plan in 2017. The Council 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 21st February and 4th April 2018. The City of York Council proposed a small number of changes to the Plan following the update of the HRA (2018) prior to submission (the changes were appraised in the SA Report Addendum (April 2018)).

The draft Local Plan was then submitted to the Secretary of State for examination on 25th May 2018. As the draft Local Plan was submitted before the 24th January 2019, under the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (NPPF) (2019), it will be examined against the national planning policy provisions of the previous NPPF (2012) and National Planning Policy Guidance (PPG).

Following the submission of the Local Plan for examination, the Council is now proposing a number of modifications to the draft Local Plan linked to updated housing needs, HRA and Green Belt evidence base. These are contained within the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019).

Update of the housing needs, HRA and Green Belt evidence

Housing Needs Update

Following the submission of the draft Local Plan, the Council has updated their housing requirement evidence in the Housing Needs Update, January 2019 prepared by GL Hearn⁴. The report explores the 2016 base national population projections and sub-national housing projections. GL Hearn's calculations resulted in a fairly wide range of growth of between 489 dwellings per annum (dpa) and 679 dpa. In accordance with the National Planning Practice Guidance (NPPG), GL Hearn considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability (market signals). They calculated that the housing need required to meet an economic growth of 650 jobs per annum (based on the Local Plan target underpinned by the Employment Land Review Update, 2017) results in an economic led need for housing of up to 790 dwellings per annum. See **Section 3** for further information about the updated housing needs evidence.

³ A previously submitted Core Strategy was withdrawn in 2013, following the introduction of the National Planning Policy Framework and the revocation of the Regional Strategy (Yorkshire and Humber Plan).

⁴ GL Hearn (January 2019) City of York – Housing Needs Update



Habitats Regulations Assessment

Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites⁵ to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA)⁶.

The HRA 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 SA Objective 8 (biodiversity). The SA Report (Feb 2018) noted that the HRA (2017)⁷ had not been finalised and 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).

Prior the submission of the draft Local Plan for examination, the Council updated their evidence on Habitats Regulations Assessment (HRA) (April 2018)⁸. Following Appropriate Assessment and the identification of mitigation, the HRA concluded that there would be no adverse effect on the integrity of any European sites from the policies of the Local Plan. To inform the HRA (April 2018), the Council 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)⁹.

A small number of changes were proposed to the plan to ensure the mitigation identified in the HRA was included in the Local Plan. These were appraised (alongside the other changes) and included in the SA Report Addendum (April 2018).

Following Natural England stating that they considered, on the basis of the evidence provided, that adverse effects on integrity could not be ruled out, the Council commissioned visitor surveys and subsequently updated the HRA (Feb 2019)¹⁰. The HRA (Feb 2019) found that, following Appropriate Assessment, the addition of mitigation measures for site E18 would be sufficient to remove the threat of an adverse effect on Strensall Common SAC. However, adverse effects on the site's integrity could not be ruled for Policy SS19 (site ST35) and site H59. The HRA recommended removal of the policy/sites which the Council has accepted and which it has reflected in the further changes to the Local Plan.

This Report addresses the policy and site changes made in response to the update of the HRA (Feb 2019). The Report should be read alongside the SA Report (Feb 2018) and SA Report Addendum (April 2018). See **Section 4** for further detail about the HRA.

⁵ Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

⁶ 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.

⁷ Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

⁸ 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

⁹ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Habitats Regulations Assessment: Air Quality Modelling Assessment

¹⁰ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

Green Belt

The Council submitted a Topic Paper¹¹ to the examination which set out the approach to defining the Green Belt across the City. The Council prepared an Addendum¹² which provides further clarity on the approach to defining the inner and outer Green Belt boundary and the exceptional circumstances within which allocations within the general extent of green belt have been made.

The Addendum brings together the Council's conclusions from previously published evidence and decision making. As part of the further work undertaken to produce the Addendum, and as a result of the proposed modifications required by the updated HRA (Feb 2019), the Council has proposed a number of modifications to the Green Belt boundary depicted on the 2018 policies map (see the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019) for detailed mapping of the changes and **Appendix A** for consideration of the proposed modifications).

What is Sustainability Appraisal?

National planning policy¹³ 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 Plan¹⁴. 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 Directive¹⁵ and related UK regulations¹⁶ 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 is therefore an integral part of the preparation of the Local Plan.

Determining the significance of the Proposed Modifications for SA

The proposed modifications in the City of York Local Plan Publication Draft – Proposed Modifications have been reviewed to determine whether further appraisal is required. **Section 2.2** sets out the principles that have been used to determine the likely significance of any proposed modification. These include consideration of the implications for the SA where the proposed modification:

- introduces a new policy;
- adds text to an existing policy such as the introduction of an additional criterion;
- deletes text from a policy or removes the policy in entirety;
- amends the supporting text clarifying how policies will be implemented;
- adds, deletes or amend proposed site allocations.

¹¹ City of York Council (2018) Topic Paper 1: Approach to York's Green Belt

¹² City of York Council (2019) Topic Paper 1: Approach to York's Green Belt Addendum

¹³ See paragraph 150-151 of the National Planning Policy Framework (Department for Communities and Local Government, 2012). The draft Local Plan was submitted for examination before 24th January and is therefore being assessed against the NPPF (2012) rather than the latest NPPF (2019).

¹⁴ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

¹⁵ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

¹⁶ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

The screening of the proposed modifications is set out in **Appendix A**. The summary of those proposed modifications that are considered significant for SA is set out in **Section 5.2** (and summarised in **Table NTS 4**).

How have the proposed modifications 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**.

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 housing requirement options, Local Plan Publication Draft 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 **Appendices B, F and G**). 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. Where matrices were included in the SA Report Addendum (April 2018) and have been updated

for this Report, the additions and deletions to the previous text are also highlighted in **bold** (see **Section 2.4 and 2.5** for the approach to the updated appraisals). The outcome of these appraisals is summarised in **Section 5**. See **Appendix B to G** for appraisals.

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**). The updated consideration of effects of housing sites are presented in **Appendix D**. The updated reasons for site selection and rejection are included in **Appendix E**.

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 are presented in **Appendix C**. The updated reasons for site selection and rejection are included in **Appendix E**.

What are the findings of the report?

Table NTS.4 below identifies the proposed modifications that are considered significant to the SA. The results of the review of all such modifications are set out in **Appendix A**.



Table NTS 4 Summary of Proposed Modifications to the Publication Draft Local Plan that are considered significant

Proposed Modification reference(s)	Key reference in Publication Draft Local Plan	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
PM3 PM4 PM5 PM20a to PM20d PM21a to PM21d PM22	<p>Policy SS1: Delivering Sustainable Growth for York Para 2.5 / explanation</p> <p>Policy H1: Housing Allocations Explanation Figure 5.1 / Table 5.2/ Para 5.9</p>	<p>Amendment to policy and supporting text, including housing trajectory, to change the housing requirement in the plan to 790 dwellings per annum rather than 867.</p>	<p>The proposed modifications to the housing requirement and supporting text in SS1 and H1 reflect the latest housing need evidence in the Housing Needs Update, January 2019 (GL Hearn). The publication plan preferred housing figure and reasonable alternatives were appraised in the SA Report (Feb 2018). The appraisal should be reviewed and updated to reflect the proposed change to the housing figure and latest evidence.</p>
PM6 PM8 PM11 PM18 PM19 PM39	<p>Policy H1: Housing Allocations</p> <p>Site Allocation H59</p> <p>Strategic Site Allocation ST35</p> <p>Policies Map North - Strensall Village</p> <p>Consequential explanatory cross reference in Policy SS10: Land North of Monks Cross; Policy SS12: Land West of Wigginton Road; Policy SS13: Land West of Elvington Lane</p>	<p>Deletion of site allocation H59</p> <p>Deletion of site allocation ST35</p>	<p>The proposed modifications see the deletion of a strategic site (ST35) and general housing site (H59) following the conclusions of the HRA (Feb 2019). The implications for the SA due to the proposed deletion should be reviewed and the SA Report should be updated to reflect the deletion. Implications for housing supply from deletion of site should also be reviewed.</p>
PM9 PM10	<p>Policy SS13: Land West of Elvington Lane</p>	<p>Amendments to policy criterion regarding open space.</p>	<p>The proposed modifications are not considered significant in themselves. However, the policy was re-appraised in the SA Report Addendum (April 2018) in light of the HRA (April 2018). The implications of the updated HRA (Feb 2019) for the policy appraisal against SA Objective 8 (biodiversity) should be reviewed.</p>
PM12	<p>Policy SS18: Station Yard, Wheldrake</p>	<p>Clarification regarding the mitigation required linked to the HRA (Feb 2019).</p>	<p>The proposed modifications are not considered significant in themselves. However, the policy was re-appraised in the SA Report Addendum (April 2018) in light of the HRA (April 2018). The implications of the updated HRA (Feb 2019) for the policy appraisal against SA Objective 8 (biodiversity) should be reviewed.</p>
PM13 PM14	<p>Policy SS19: Queen Elizabeth Barracks, Strensall</p>	<p>Deletion of policy linked to the deletion of site ST35.</p>	<p>The proposed modification sees the deletion of a strategic policy due to the proposed deletion of the strategic site (ST35), following the conclusions set out in the HRA (Feb 2019). The implications for the SA due to the proposed deletion should be reviewed and the SA Report should be updated to reflect the deletion.</p>
PM16	<p>Policy EC1: Employment Allocations</p>	<p>Modification to footnote for site E18 that was proposed in the schedule of modifications to the submitted plan (25th May) following removal of ST35.</p>	<p>The proposed change in May 2018 (CD003) led to a reappraisal of Policy EC1 as set out in the SA Report Addendum (April 2018). The appraisal commentary was also updated to reflect the HRA (April 2018). The appraisal against SA Objective 8 (biodiversity) should be reviewed to consider the implications. The</p>



Proposed Modification reference(s)	Key reference in Publication Draft Local Plan	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
			commentary should also be updated to reflect the updated HRA (Feb 2019).
PM24	Policy D1: Placemaking	Addition policy wording to clarify that residential amenity should be considered as part of overall design standards as part of the planning process.	The proposed modification sees additional wording included to avoid negative effects on residential amenity. The appraisal against health (SA Objective 2) should be reviewed.
PM26	Policy GI2: Biodiversity and Access to Nature	Addition of three criteria to include reference to internationally and nationally designated conservation sites.	The proposed modification introduces new policy criteria related to designated sites. The policy was appraised as having 'significant positive' effects on biodiversity (SA Objective 8) and the change reinforces these positive effects. However, the appraisal commentary should be reviewed to ensure consistency with the proposed change.
PM45 PM46	Table 5.2 Delivery and Monitoring	Introduction of additional indicator (and associated target) regarding visitor numbers at Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC	Appendix J of the SA Report (Feb 2018) included indicative monitoring indicators for the SA Objectives. The new monitoring indicator should be reflected in this SA Report Addendum.

As **Table NTS 4** demonstrates, the proposed modifications do result in the need for changes to the SA. The outcomes of the appraisal are summarised below.

Preferred housing growth figure

The preferred housing growth figure (790 dpa) has been appraised against the SA objectives and reasonable alternative figures (867 dpa, 953 dpa and 1,070 dpa) re-appraised. The preferred figure of 790 dpa is underpinned by Housing Needs Update, January 2019 (GL Hearn) prepared in accordance with the transitional arrangements in the NPPF (2019). It represents the full economic led objectively assessed need (OAN). The preferred figure of 790 dpa has been found to have positive effects across a number of objectives relating to housing, education, employment.

The reasonable alternatives (867 dpa, 953 dpa, and 1,070 dpa) have been found to have the same effects as identified in the Publication Draft stage SA Report (2018) with the exception of the 867 dpa figure against the housing objective. Due to the updated OAN evidence the appraisal found positive effects for the Publication Draft alternative figure in the long term. In the SA Report (2018) it was found to have minor negative as it did not meet the housing need figure identified in the evidence at the time (SHMA 2017 Update). The appraisal of the housing figure (and alternatives) is set out in **Appendix B** and summarised in **Section 5.3**.

Spatial Strategy policies

The updated housing requirement proposed in SS1 led to a reappraisal of the policy. The appraisal found that the policy has positive effects against housing (SA Objective 1) in recognition that it delivers the full economic led OAN identified in the Housing Needs Update, January 2019 (GL Hearn). At Publication Draft stage the SA Report (Feb 2018) found a mix of minor positive and minor negative effects against housing (SA Objective 1), linked to evidence in the SHMA 2017 Update which has now been superseded. The re-appraisal found no negative effects against the housing objective.

The proposed modifications to policies SS13 and SS18 are themselves not considered significant. However, the updated HRA (Feb 2019) means that some of the evidence supporting the re-appraisal against biodiversity (SA Objective 8) reported in the SA Report Addendum (April 2018) has effectively been superseded (even though its conclusions have been reconfirmed). The proposed changes to Policy SS13 were assessed as having 'minor negative' effects on SA Objective 8 (biodiversity) in the SA Report Addendum (April 2018), recognising that although uncertainty may be removed with regards to mitigation for effects on the Lower Derwent Valley SPA, potential effects on Heslington Tillmire SSSI remain. The proposed modifications include no further changes for Policy SS13. No changes have been identified for the appraisal, but the commentary has been updated to reflect the HRA (Feb 2019).

No changes have been identified for the appraisal of SS18 and the original SA Report (Feb 2018) assessment of 'minor positive effects' for this policy remains. However, the appraisal commentary has been updated to reflect the HRA (Feb 2019).

The outcomes are presented in **Section 5.4** and **Appendix F**.

Strategic sites

The HRA (Feb 2019) recommended deletion of site ST35 because, following Appropriate Assessment, it could not rule out adverse effects on the integrity of the Strensall Common SAC. This is reflected in the proposed modifications. The Council considers that there was no alternative but to delete the site (and site H59) as the recreational pressures would remain present with a smaller site. Given that the proposed reduction in the housing requirement in effect leads to an increase in projected housing delivery above the requirement, it is not considered that additional sites (reasonable alternatives) for replacement of the deleted site are required. Apart from the change in proposed status of the site from an allocation to a reasonable alternative, and updates to commentary regarding the HRA (Feb 2019), no other changes to the on the SA have been identified.

With regard to strategic sites ST13 and ST33 no changes have been recorded in the scoring of effects identified in the appraisal presented in the SA Report (Feb 2018) (and reconfirmed in the SA Report Addendum (April 2018)). However, commentary for the sites has been revised to reflect the outcome of the HRA (Feb 2019), which reconfirms the conclusions of the previous HRA (April 2018). See **Section 5.4** and **Appendix C**. The updated reasons for site selection and rejection are included in **Appendix E**.

Local housing and employment sites

The HRA (Feb 2019) recommended deletion of site H59 because, following Appropriate Assessment, it could not rule out adverse effects on the integrity of the Strensall Common SAC. This is reflected in the proposed modifications. As set out above, the Council considers that there is no meaningful way to mitigate the effects of recreational pressure on the Strensall Common SAC and limit access to it through a reduction in the site. Therefore, they propose removal of the site in its entirety (along with ST35). No reasonable alternative housing sites are required as the projected housing supply is considered to be more than sufficient to meet the 790 dpa requirement. The four additional housing site alternatives were also appraised.

No changes were recorded for the appraisal of site E18 having 'significant negative' effects on SA Objective 8 (biodiversity) (as a function of the site appraisal scoring system) which could be mitigated through policy, as the conclusions of the HRA (Feb 2019) reconfirmed those in the previous HRA (April 2018). However, the appraisal commentary has been updated. See **Section 5.4**. The updated reasons for housing site selection and rejection are included in **Appendix E**.

Thematic policies

The change in the housing figure and deletion of sites ST35 and H59 led to a reappraisal of Policy H1. The appraisal found minor positive effects for against housing (SA Objective 1), as the policy was delivering

housing that will meet the objectively assessed housing need identified in the Housing Needs Update, January 2019 (GL Hearn). In the SA Report (2018) the policy had been found to have a mix of minor positive and negative effects as it did not meet the full identified OAN figure based on the evidence at the time (the SHMA 2017 Update). The proposed deletion of the two sites was found to be counterbalanced by the reduction in the housing requirement and did not undermine the appraisal of positive effects against the housing objective.

The reappraisal of Policy EC1 set out in the SA Report Addendum (April 2018) found 'neutral' effects against biodiversity (SA Objective 8) as some uncertainty had been removed due to the HRA (April 2018) findings. The appraisal was reviewed in light of the updated HRA (Feb 2019) which reconfirmed these findings. No further changes to the appraisal were identified. Policies D1 and GI2 were re-appraised in light of the proposed modifications but no changes to the scoring were identified.

No proposed modifications to the Green Belt boundary were considered to have implications for the SA (except for changes related to ST35 and H59 discussed above). There were no implications for appraisal of the Green Belt policies of the draft Local Plan. See **Section 5.5** and **Appendix G**.

Cumulative effects

Two changes in the assessment of overall effects of the (modified) Publication Draft on the SA Objectives have been identified, following the review outlined above. The changes reflect the removal of negative effects on housing (SA Objective 1) due to policies SS1 and H1 meeting the latest identified objectively assessed housing needs in the City of York area. No changes to the overall appraisal of other sections of the draft Local Plan against the SA Objectives have been identified. See **Section 5.6**.

Monitoring

The proposed modifications include the addition of a monitoring indicator (and target) related to visitor numbers at designated European conservation sites (Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC). The monitoring indicators should be reflected in the SA monitoring framework, which will be confirmed in the Post Adoption Statement, following the close of the examination. See **Section 6.2**.

Next steps

This June 2019 addendum to the SA Report (Feb 2018) is a supporting document to the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019). The Council is not inviting further comments on the submitted Plan where there are no proposed modifications.

Comments are invited on the findings and recommendations of this report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

The consultation runs from **Monday 10th June** to midnight on **Monday 22nd July 2019**.

Your comments should be made using a representation form available to complete via York Council's website: www.york.gov.uk/localplan

Or alternatively please pick up a representation form from West Offices reception, York Explore or York Libraries. Please state clearly which Proposed Modification number (PM) or document your response relates to.

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1. Introduction

1.1 Overview

- 1.1.1 The City of York Council (the Council) is currently preparing a new Local Plan for the City of York (the draft Local Plan). 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 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 and submitted the draft Local Plan for examination on 25th May 2018.
- 1.1.2 The Council, with support from Wood Environment and Infrastructure Solutions UK Ltd¹⁷ (Wood), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft and published a SA Report alongside the consultation Local Plan in February 2018¹⁸ (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 Prior to the submission of the draft Local Plan for examination, the Council updated their evidence on Habitats Regulations Assessment (HRA) (April 2018)¹⁹ and identified a number of changes to the draft Local Plan²⁰. Wood and the Council prepared a SA Report Addendum (April 2018)²¹ to appraise the changes related to the HRA (April 2018).
- 1.1.4 The Council is now proposing a number of modifications to the draft Local Plan linked to updates to the evidence base in terms of updated housing needs, HRA and the Green Belt (see **Appendix A** for modifications). The Council are consulting on these proposed modifications in the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019). Some of these proposed modifications are the same as the proposed changes submitted with the Local Plan in May 2018 or supersede the changes submitted with the draft Local Plan. Others are newly identified.
- 1.1.5 This SA Report Addendum (June 2019) has been prepared to assess the implications for the SA of the proposed modifications. It appraises the likely significant effects of the proposed modifications in order to update the SA Report (Feb 2018) and SA Report Addendum (April 2018) (as appropriate) and ensure that all the likely significant effects of the draft Local Plan (as proposed to be modified) have been identified, described and evaluated.

¹⁷ 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.

¹⁸ Amec Foster Wheeler and City of York Council (February 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report

¹⁹ 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

²⁰ See the City of York Council (2019) City of York Local Plan Publication Draft Schedule of Minor Modifications to 25th May 2018 (CD003) for the list of proposed changes submitted with the Publication Draft Local Plan. Available via:

https://www.york.gov.uk/downloads/file/15871/cd003_-_city_of_york_local_plan_publication_draft_schedule_of_minor_modifications_to_25th_may_2018_pdf

²¹ Wood and City of York Council (April 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum

1.2 Local Plan evidence base updates

- 1.2.1 The following sections briefly describes the updated evidence base that the Council has taken into account when proposing a number of modifications to the draft Local Plan.

Housing Needs Update

- 1.2.2 Following the submission of the draft Local Plan, the Council has updated their housing requirement evidence in the Housing Needs Update, January 2019 prepared by GL Hearn²². The report explores the 2016 base national population projections and sub-national housing projections. GL Hearn's calculations resulted in a fairly wide range of growth of between 489 dwellings per annum (dpa) and 679 dpa. In accordance with the National Planning Practice Guidance (NPPG), GL Hearn considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability (market signals). They calculated that the housing need required to meet an economic growth of 650 jobs per annum (based on the Local Plan target underpinned by the Employment Land Review Update, 2017) results in an economic led need for housing of up to 790 dwellings per annum. See **Section 3** for further information about the updated housing needs evidence.

Habitats Regulations Assessment (HRA)

- 1.2.3 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites²³ to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA)²⁴.
- 1.2.4 The HRA 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 SA Objective 8 (biodiversity). The SA Report (Feb 2018) noted that the HRA (2017)²⁵ had not been finalised and 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).
- 1.2.5 Prior the submission of the draft Local Plan for examination, the Council updated their evidence on Habitats Regulations Assessment (HRA) (April 2018)²⁶. Following Appropriate Assessment and the

²² GL Hearn (January 2019) City of York – Housing Needs Update

²³ Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

²⁴ 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.

²⁵ Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

²⁶ 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

identification of mitigation, the HRA concluded that there would be no adverse effect on the integrity of any European sites from the policies of the Local Plan. To inform the HRA (April 2018), the Council 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)²⁷.

- 1.2.6 A small number of changes were proposed to the plan to ensure the mitigation identified in the HRA was included in the Local Plan. These were appraised (alongside the other changes) and included in the SA Report Addendum (April 2018).
- 1.2.7 Following Natural England stating that they considered, on the basis of the evidence provided, that adverse effects on integrity could not be ruled out, the Council commissioned visitor surveys and subsequently updated the HRA (Feb 2019)²⁸. The HRA (Feb 2019) found that, following Appropriate Assessment, the addition of mitigation measures for site E18 would be sufficient to remove the threat of an adverse effect on Strensall Common SAC. However, adverse effects on the site's integrity could not be ruled for Policy SS19 (site ST35) and site H59. The HRA recommended removal of the policy/sites which the Council has accepted and which it has reflected in the further changes to the Local Plan.
- 1.2.8 This Report addresses the policy and site changes made in response to the update of the HRA (Feb 2019). The Report should be read alongside the SA Report (Feb 2018) and SA Report Addendum (April 2018). See **Section 4** for further detail about the HRA.

Green Belt

- 1.2.9 The Council submitted a Topic Paper²⁹ to the examination which set out the approach to defining the Green Belt across the City. The Council prepared an Addendum³⁰ which provides further clarity on the approach to defining the inner and outer Green Belt boundary and the exceptional circumstances within which allocations within the general extent of green belt have been made.
- 1.2.10 The Addendum brings together the Council's conclusions from previously published evidence and decision making. As part of the further work undertaken to produce the Addendum, and as a result of the proposed modifications required by the updated HRA (Feb 2019), the Council has proposed a number of modifications to the Green Belt boundary depicted on the 2018 policies map (see **Appendix A** for consideration of the proposed changes).

Further consultation

- 1.2.11 The Council has submitted the proposed changes and supporting evidence base to the examination. The Planning Inspectors appointed to conduct the examination of the draft Local Plan requested that the Council consult on the proposed changes and supporting evidence base in a letter dated 7th May 2019³¹. This SA Report Addendum has therefore been prepared to consider and address the implications for the SA from the changes proposed arising from the updated evidence base for the housing figure, HRA and Green Belt boundary.

²⁷ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Habitats Regulations Assessment: Air Quality Modelling Assessment

²⁸ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

²⁹ City of York Council (2018) Topic Paper 1: Approach to York's Green Belt

³⁰ City of York Council (2019) Topic Paper 1: Approach to York's Green Belt Addendum

³¹ Available via: https://www.york.gov.uk/downloads/file/17899/ex_ins_6_inspectors_letter_to_coyc_-_7_may_2019

- 1.2.12 The Report also covers the changes proposed prior to the submission of the draft Local Plan set out in Core Document 003 (CD003)³². The SA Report Addendum (April 2018) considered the implications for SA from the proposed changes linked to the HRA (April 2018) evidence. This Report considers all of the proposed changes contained within CD003 and the newly identified proposed modifications. However, some of the changes appraised in the SA Report Addendum (April 2018) have been superseded. For example, the proposed modifications include the deletion of Policy SS19 and site ST35 based on the conclusions of the updated HRA (Feb 2019). These proposed modifications supersede those relating to the policy/site contained in CD003. Full details of the Proposed Modifications, including where they superseded previously proposed changes, are contained in **Appendix A**.

1.3 Background

- 1.3.1 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.
- 1.3.2 The City of York Local Plan has been in preparation since 2013³³. 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.
- 1.3.3 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.
- 1.3.4 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 LPWG 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

³² City of York Council (2019) City of York Local Plan Publication Draft Schedule of Minor Modifications to 25th May 2018 (CD003). Available via: https://www.york.gov.uk/downloads/file/15871/cd003_-_city_of_york_local_plan_publication_draft_schedule_of_minor_modifications_to_25th_may_2018_pdf

³³ A previously submitted Core Strategy was withdrawn in 2013, following the introduction of the National Planning Policy Framework and the revocation of the Regional Strategy (Yorkshire and Humber Plan).

(Regulation 18 Consultation), which was consulted on between September and October 2017, reflected these changes and considerations by the City of York Council Executive.

- 1.3.5 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.
- 1.3.6 A full overview of the development of the Local Plan and the SA undertaken at each stage up to Publication Draft stage is set out in Section 2 of the SA Report (Feb 2018).
- 1.3.7 Following the update of the Habitats Regulations Assessment (HRA) (April 2018) and its conclusion that there were are no adverse effects on the integrity of European sites, the Council proposed a small number of changes to the Local Plan prior to submission the Plan to the Secretary of State for examination. The implications for SA from the HRA conclusions and associated proposed changes were subject to appraisal in the SA Report Addendum (April 2018). The draft Local Plan was then submitted to the Secretary of State for examination on 25th May 2018. As the draft Local Plan was submitted before the 24th January 2019, under the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (NPPF) (2019), it will be examined against the national planning policy provisions of the previous NPPF (2012) and National Planning Policy Guidance (PPG).
- 1.3.8 Following the submission of the Local Plan for examination, the Council is now proposing a number of modifications to the draft Local Plan linked to updated housing needs, HRA and Green Belt evidence base. In some cases, these proposed modifications are the same as, or supersede, the proposed changes to the draft Local Plan that were appraised in the SA Report Addendum (April 2018). These proposed modifications are the subject of this Report.
- 1.3.9 Additionally, the Council has identified that four sites (one as an amendment to a previously submitted site) were submitted at Publication Draft stage that have not been subject to SA. The sites have therefore been appraised and the appraisal is reported on in this Report.

1.4 The proposed modifications

- 1.4.1 The main elements of the proposed modifications to the Local Plan Publication Draft are summarised in the text below. Please see **Appendix A** for the full wording of the changes.
- Proposed changes to policies SS1 and H1 to amend the housing requirement to 790 dwellings per annum with associated changes to the housing trajectory and explanatory text.
 - The deletion of ST35 (and associated Policy SS19) and H59 linked to the conclusions of the HRA (Feb 2019) and updates to indicators.
 - Additional cross reference in Policy SS13 to where the proposed open space to support the site ST15 is set out within the Local Plan.
 - Additional text within Policy SS18 to promote the use of other sites less sensitive than Lower Derwent Valley SPA and promote good visitor behaviour when visiting the site.
 - Amendments to Policy EC1 and explanatory text to ensure that GI2 is be taken account for site E18.
 - Amendments to Policy HW1 to include reference to 'public houses' as community facilities.

- Proposed changes to policies D1 to ensure residential amenity is considered through design and D4 to ensure all applications provide detailed design elements in Conservation Areas.
- Additional policy criteria and explanatory text related to internationally and nationally designated sites within Policy GI2.
- Changes to the Inner Green Belt boundaries and removal of sites ST35 and H59 linked to HRA evidence.

1.4.2 In addition to the proposed modifications, four sites (one amendment) have also been appraised.

1.5 The requirement for Sustainability Appraisal

1.5.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations, the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

1.5.2 The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is “to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

1.5.3 At paragraphs 150 and 151, the National Planning Policy Framework (NPPF) (2012)³⁴ sets out that Local Plans are key to delivering sustainable development and must be prepared with the objective of contributing to the achievement of sustainable development³⁵. In this context, paragraph 165 of the NPPF³⁶ reiterates the requirement for SA/SEA as it relates to local plan preparation:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

1.5.4 The PPG (Plan-making paragraph 037³⁷) 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 provides the “most appropriate strategy” (NPPF 2012) or “an appropriate strategy” (NPPF 2019), taking into account the reasonable alternatives, and based on proportionate evidence.

³⁴ Ministry of Housing, Communities and Local Government (2012) *National Planning Policy Framework*. Available from <https://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed May 2019]. Paragraph 16 of the NPPF (2019) sets out that local plans must be prepared with the objective of contributing to the achievement of sustainable development.

³⁵ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004).

³⁶ The requirement for SA/SEA for local plan preparation is set out at paragraph 32 of the NPPF (2019).

³⁷ Planning Practice Guidance, Reference ID 61-037-20190315 (Revision date: 15/03/2019)

- 1.5.5 In this context, SA is an integral part of the preparation of the Local Plan for York. SA of the Local Plan will help to ensure that the likely social, economic and environmental effects of the Plan are identified, described and appraised. Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures will be considered that could enhance such effects.

Sustainability Appraisal of the draft City of York Local Plan

- 1.5.6 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:

- Local Plan Preferred Options (2013);
- Further Sites Consultation (2014);
- Local Plan Publication Draft (2014)³⁸;
- Preferred Sites Consultation (2016);
- Local Plan Pre-Publication Draft (Regulation 18 Consultation) (2017); and
- Local Plan Publication Draft (Regulation 19 Consultation) (2018) and submission of the Plan

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).

- 1.5.7 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.

1.6 Purpose of this report

- 1.6.1 This document is the June 2019 addendum to the City of York Local Plan: Publication Draft - Sustainability Appraisal Report (Feb 2018). The purpose of this addendum is to assess the significant likely effects of the proposed modifications to the draft Local Plan provided to the Local Plan examination in March 2019 in order to update the previous SA as appropriate and to ensure that all the likely significant effects of the Local Plan (as proposed) have been identified, described and evaluated. The report supports the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019).

- 1.6.2 This report should be read in conjunction with the City of York Local Plan: Publication Draft - Sustainability Appraisal Report (February 2018) and City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (April 2018) which can be accessed through the Council's website:

https://www.york.gov.uk/downloads/download/4337/local_plan_submission_documents_1.

³⁸ 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.

- 1.6.3 The purpose of this report is to ensure that where relevant, the SA Report (Feb 2018) and the SA Report Addendum (April 2018) have been updated to reflect the outcomes related to the Housing Needs Update, January 2019 (GL Hearn), the latest HRA (Feb 2019) and the approach to Green Belt across the City, and to consider the proposed policy changes made in response to the findings of this evidence within the context of the requirements for SA (including the SEA Directive). Additionally, the Report will set out the appraisal of four sites submitted at the Regulation 19 Consultation stage.

1.7 Structure of this addendum

- 1.7.1 This report contains the following sections:
- Section 2 sets out the overall SA approach;
 - Section 3 sets out the findings of the Housing Needs Update, January 2019 (GL Hearn);
 - Section 4 sets out the findings of the HRA to date;
 - Section 5 sets out the appraisal of effects; and
 - Section 6 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 changes to policies/sites have then been appraised. It also sets out the SA objectives against which those proposed modifications that are considered to be significant have been appraised. The SA methodology is the same as that applied to each earlier iteration of the draft Local Plan.

2.2 Determining the significance of the Proposed Modifications for SA

- 2.2.1 This section sets out the approach to determining the significance of the proposed changes. 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 to the SA 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 have not been previously assessed and are likely to give rise to significant effects.

Key principles

- 2.2.2 The screening of the proposed modifications is set out in **Appendix A**. The summary of those proposed modifications that are considered significant for SA is set out in **Section 5.2**.
- 2.2.3 Where a proposed modification to a policy introduces an additional criterion, a judgement was made as to whether or not the proposed modification would affect the previous appraisal and/or should be acknowledged in the appraisal. In such instances, significance has been determined on a case by case basis and a comment made in the relevant appendix on whether or not the previous appraisal has been amended and which SA objectives are affected.
- 2.2.4 Where proposed modifications involve the deletion of text from a policy, the revised wording has been considered to see if it has any implications for the SA, both in terms of the conclusions of the SA or the commentary accompanying relevant part of the assessment. Where proposed modifications involve the introduction of a new policy, this would be treated as significant, although no such instances were identified.
- 2.2.5 Proposed modifications to supporting text clarify how policies will be implemented and/or provide justification for them. Such proposed modifications have not been considered to be significant, except where they give effect to changes identified for the housing requirement or deletion of sites from the plan.
- 2.2.6 Two site allocations and one policy have been deleted. The implications have been reflected in the SA. Some Green Belt boundaries have been amended and a judgement made on a case by case basis as to whether the change was considered significant or not.
- 2.2.7 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. Where matrices were included in the SA Report Addendum (April 2018) and have been updated for this Report, the additions and deletions to the previous text are also highlighted in

bold (see **Section 2.4 and 2.5** for the approach to the updated appraisals). The outcome of these appraisals is summarised in **Section 5**. See **Appendix B to G** for appraisals.

2.3 SA Framework

- 2.3.1 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.
- 2.3.2 **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.
- 2.3.3 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).

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

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

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
11. Reduce waste generation and increase level of reuse and recycling	<ul style="list-style-type: none"> Promote reduction, re-use, recovery and recycling of waste Promote and increase resource efficiency 	Material Assets
12. Improve air quality	<ul style="list-style-type: none"> Reduce all emissions to air from current activities Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels) Support the development of city wide low emission infrastructure; Improve air quality in AQMAs and prevent new designations; Avoid locating development where it could negatively impact on air quality Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users Promote sustainable and integrated transport network to minimise the use of the car 	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"> Reduce risk of flooding Ensure development location and design does not negatively impact on flood risk Deliver or incorporate through design sustainable urban drainage systems (SUDs) 	Climatic Factors, Water
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	<ul style="list-style-type: none"> Preserve or enhance the special character and setting of the historic city Promote or enhance local culture Preserve or enhance designated and non-designated heritage assets and their setting Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper 	Cultural Heritage, Landscape
15. Protect and enhance York's natural and built landscape	<ul style="list-style-type: none"> Preserve or enhance the landscape including areas of landscape value Protect or enhance geologically important sites; Promote high quality design in context with its urban and rural landscape and in line with the "landscape and Setting" within the Heritage Topic Paper 	Cultural Heritage, Landscape

2.4 Appraisal of policies

2.4.1 Where policies have been re-appraised, the following scoring system has been used to appraise the effects against the SA objectives. The scoring system (**Table 2.2**) 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. The scoring system has also been used to appraise the housing figure and alternatives (see **Appendix B**) in line with the approach set out in the SA Report (Feb 2018).

Table 2.2 Scoring system used in the SA of proposed policies and sites

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect on the SA objective.

Symbol	Likely 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.

- 2.4.2 The policy re-appraisal within **Appendices F and G** utilises the same matrices and original text as the SA Report (2018). Where changes to the SA scoring or appraisal commentary have been identified these are presented in underline for additional text or with ~~strikethrough~~ for deleted text. Where the text is not underlined or struck through it is the original appraisal text taken from the relevant SA Report (Feb 2018) appendix and has not been changed. The original text for SA Objective 8 is taken from the SA Report Addendum (April 2018) Appendix C. For this objective the appendices include the changes to the SA Report (2018) in underline and strikethrough but any new amendments are in **bold**.³⁹
- 2.4.3 For clarity and legibility, the appraisal of the housing figure and reasonable alternatives (**Appendix B**) has not been presented with underline/strikethrough. The appraisal is set out in a new matrix rather than using in an updated SA Report (2018) matrix.

2.5 Appraisal of sites

- 2.5.1 In the SA Report (Feb 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**.
- 2.5.2 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.

³⁹ Within Appendix G only the Housing and Economy and Retail sections include previously revised text from the SA Report Addendum (April 2018).



















- 2.5.3 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.
- 2.5.4 **Appendices C and D** set out the update of the appraisal of sites received at Publication Draft stage and reflects where sites are proposed to be deleted from the draft Local Plan. **Appendix E** provides an updated site audit trail to reflect the proposed deletion of sites from the draft Local Plan and the newly appraised sites.
- 2.5.5 Where changes to the SA scoring, appraisal commentary or site audit trail have been identified these are presented in underline for additional text or with ~~strikethrough~~ for deleted text. Where the text is not underlined or struck through it is the original text taken from the relevant SA Report (Feb 2018) appendix and has not been changed.
- 2.5.6 For the appraisal of the strategic sites against SA Objective 8 (**Appendix C**), the original text is taken from the SA Report Addendum (April 2018) Appendix B. For this objective the appendices include the changes to the SA Report (2018) in underline and strikethrough but new amendments are in **bold**.
- 2.5.7 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 Indicator	Maximum score		Indicative SA Scoring ⁴⁰	
		Per indicator	Total	Points scored	SA Symbol
1: To meet the diverse housing needs of the population in a sustainable way.	No. of dwellings proposed/estimated	n/a	n/a	100+ 1-99 0	++ + 0
2: Improve the health and well-being of York's population	Access to: • doctors • open space	5 5	10	6-10 3-5 1-2 0	++ + - --
3: Improve education, skills development and training for an effective workforce	(Housing) Access to: • nursery provision • primary schools • secondary schools • higher education facilities (Employment) Access to: • nursery provision	5 5 5 5 5	20 5	11 -20 5-10 1-4 0 4-5 1-2 0	++ + - -- ++ + -
4: Create jobs and deliver growth of a sustainable and inclusive economy	No. of jobs potentially created	n/a	n/a	100+ 1-99 0	++ + 0
5: Help deliver equality and access to all	Access to: • Non-frequent bus routes	3	33 ⁴¹	Employment score: 18-33 9- 17 1-8 0	++ + I --
6: Reduce the need to travel and deliver a sustainable integrated transport network	• Frequent bus routes • Park and ride bus stops • Railway station by walking • Railway station by cycling • Adopted highways	5 5 5 5 5			

⁴⁰ 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.

⁴¹ The total scoring applied to Objective 6 was reduced from a maximum score of 38 to reflect the deletion of neighbourhood centres as an indicator. Public rights of way were also removed as an indicator from this objective.

SA Objective	Relevant Assessment Criteria		Maximum score		Indicative SA Scoring ⁴⁰	
	Indicator		Per indicator	Total	Points scored	SA Symbol
	<ul style="list-style-type: none"> Cycle routes Additional access for Housing sites: <ul style="list-style-type: none"> Supermarket/conveniences stores 		5	Housing: 38	Housing score: 21-38 11-20 1-10 0	 ++  +  I  --
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 ⁴²	<ul style="list-style-type: none"> Statutory nature conservation designations (SPA, SCA, SSSI, Ramsar and LNR); Regional Green Infrastructure Corridor; Site of Interest for Nature Conservation (SINC); Area of Local Nature Conservation (LNC) Interest; Ancient Woodland. 		n/a	n/a	Includes/is adjacent to a non-statutory designated site.	 -
					500m from a ⁴³ statutory site 250m from a statutory designated site	 -  --
					No designations affecting site	0
9: Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> Brownfield / Greenfield/ Mixed Agricultural Land Classification 		n/a	n/a	Brownfield Mixed BF/GF GF Not Grade 1/2/3 GF and Grade1/ 2/3	 ++  + / -  -  --
10: Improve water efficiency and quality	Proximity to waterbodies		n/a	n/a	Within 10m 10 – 30m >30m	 --  - 0
	Environment Agency Groundwater Source Protection Zones (SPZ)		n/a	n/a	Zone 1 Zone 2 Zones 3 & 4 Outside SPZ	 --  -  I 0
11: Reduce waste generation and increase level of reuse and recycling	Not applicable at location level assessment					
12: Improve air quality	Air quality management area (AQMA)		n/a	n/a	Within	 --

⁴² In reference to these criteria, 'adjacent' refers to a 10m buffer from a non-statutory site.

⁴³ The scoring against SA Objective 8 was amended to reflect potential impacts on Statutory Nature Conservation Sites. Indicators including district green infrastructure and tree preservation orders were removed.

SA Objective	Relevant Assessment Criteria		Maximum score		Indicative SA Scoring ⁴⁰	
	Indicator		Per indicator	Total	Points scored	SA Symbol
					50m 250m 500m	- I 0
13: Minimise flood risk and reduce the impact of flooding to people and property in York	Environment Agency Flood Zones		n/a	n/a	Zone 3a Flood Zone 2 Flood Zone 1	-- - 0
14: Conserve and enhance York's historic environment, cultural heritage, character and setting	Heritage Impact Appraisal ⁴⁴		n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0
15: Protect and enhance York's natural and built landscape	Heritage Impact Appraisal ⁴⁵		n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0

2.6 When was the review undertaken and by whom

- 2.6.1 Work to complete this addendum to the SA Report (Feb 2018) was undertaken jointly by City of York Council and Wood in May/June 2019 with the exception of the review of implications on the strategic sites. The strategic site options were appraised solely by the City of York Council.

2.7 Technical difficulties

- 2.7.1 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.

⁴⁴ The scoring against SA Objective 14 has been informed by the evidence contained within the Heritage Impact Appraisal (HIA) and discussions with Council officers, taking into account heritage and landscape designations.

⁴⁵ The scoring against SA Objective 15 has been informed by the findings of the HIA and discussions with Council officers, taking into account landscape designations.

3. Housing Needs Update

- 3.1.1 The Council commissioned GL Hearn to prepare a Housing Needs Update, published in January 2019,⁴⁶ following the publication of the latest set of (2016-based) Sub-National Population Projections (SNPP) by the Office for National Statistics (ONS) in May 2018 and the publication of the 2016-based Sub-National Household Projections (SNHP) by ONS in September 2018. The Housing Needs Update (Jan 2019) interrogated the 2016-based SNPP, 2016-based SHNP and the 2017 mid-year population estimates.
- 3.1.2 The Housing Needs Update, January 2019 (GL Hearn) concluded that the 2016 based SNPP for York show an average annual population growth over the period 2012 to 2037 of 24,036, significantly lower than the previous (2014 based) figure of 36,348 for the same period upon which the Local Plan Publication Draft was based. The report concluded that the 2016 based SNPP provides a more robust assessment of projected population growth for York than the 2014 projections based on the analysis of components of population change, and ratified by the 2017 mid-year population estimates.
- 3.1.3 GL Hearn translated these population figures into household growth and a dwelling requirement using a range of assumptions on household representative rates and the application of a vacancy rate of 3%. This analysis identified a potential constraint within the official projections particularly for those aged 25-34 years and an alternative household representation rate scenario was developed, whereby the rates for this age group, and those aged 35 to 44 years were partially returned to the household formation rates seen in the 2008 based (pre-recession) projections. GL Hearn's calculations resulted in a fairly wide range of growth requirements of between 489 dpa and 679 dpa.
- 3.1.4 Following the application of National Planning Practice Guidance (NPPG), under transitional arrangements, GL Hearn considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability (market signals). Using a series of assumptions, they calculated that the housing need required to meet an economic growth of 650 jobs per annum (based on the Local Plan target underpinned by the Employment Land Review Update, 2017) was 790dpa.
- 3.1.5 GL Hearn also updated analysis of housing market signals which show that house prices are relatively high in York and that housing affordability is a significantly worsening issue over the last five years. Affordable Housing needs remains at 573 dpa. In accordance with NPPG an uplift to improve affordability is required and GL Hearn propose a 15% uplift. When applied to the demographic starting point (484 dpa) this 15% uplift would result in an OAN of 557 dpa.
- 3.1.6 GL Hearn stated that this was some way short of the economic led need of 790 dpa and that the economic led figure of 790dpa would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.
- 3.1.7 The Council considers that the Housing Needs Update, January 2019 (GL Hearn) supersedes the Strategic Housing Market Assessment (SHMA) Update (2017).

⁴⁶ GL Hearn (January 2019) City of York – Housing Needs Update

4. HRA update

4.1 Introduction

- 4.1.1 It is accepted best-practice for the Habitats Regulations Assessment (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.
- 4.1.2 At the time of publication of the Local Plan Publication Draft (Feb 2018), the HRA updated screening⁴⁷ had not been completed and therefore there was some uncertainty regarding the plan's effects on designated European conservation sites. The Council therefore updated the HRA⁴⁸. This included the modelling of air quality impacts of additional traffic movements arising from new growth on ecological sites⁴⁹ (which was presented as an appendix to the HRA in April 2018).
- 4.1.3 An updated HRA Report was submitted to the examination in February 2019, which superseded evidence in the HRA (April 2018). This section provides a summary of the findings of these studies.

4.2 HRA Report and air quality (April 2018) summary

- 4.2.1 The outcomes of the HRA Report (April 2018) and air quality modelling were summarised in depth in Section 3 of the SA Addendum (April 2018). This report does not seek to repeat the information presented.
- 4.2.2 In summary, the HRA (April 2018) screening assessment identified that likely significant effects (LSE) could not 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 (including the provision of a wardening service), the HRA concluded there were no adverse effects on the integrity of either the Lower Derwent Valley Special Protection Area (SPA) or the Strensall Common Special Area for Conservation (SAC).
- 4.2.3 However, Natural England challenged this conclusion in a letter of 4th May 2018, based on the evidence available, which prompted the production of visitor surveys at three European sites to assess the impact of recreational pressure (Lower Derwent Valley (SPA), Skipwith Common SAC and Strensall Common SAC and a re-assessment of the air quality data.

4.3 HRA Report (February 2019)

- 4.3.1 Following submission of the draft Local Plan, the Council commissioned visitor surveys at Strensall Common SAC and the Lower Derwent Valley⁵⁰. The Council considered that the visitor surveys

⁴⁷ Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

⁴⁸ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Habitats Regulations Assessment of the City of York Council Local Plan

⁴⁹ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

⁵⁰ The visitor survey reports prepared by Footprint Ecology are included at Appendix C of the Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

provided evidence that the proposed mitigation set out in Policy SS19 of the Publication Draft Local Plan, and the proposed modifications submitted with the Plan (appraised in the SA Report Addendum (April 2018), could not be completely relied upon. In consequence, the evidence in the visitor surveys informed further consideration of the LSE of the plan on designated conservation sites, and an Appropriate Assessment, which was reported in the HRA (Feb 2019)⁵¹.

- 4.3.2 The HRA (Feb 2019) confirmed that LSE from recreational pressure on Skipworth Common SAC could be screened out whilst an adverse effect on the integrity of Lower Derwent Valley SPA could be ruled out in line with the findings of the HRA (April 2018). However, the HRA (Feb 2019) determined that the scale of the predicted increase in visitor numbers of 24%, the uncertainty surrounding the effectiveness of the mitigation measures and the associated increase in the worrying of livestock (given the importance of the grazing regime to site management and the achievement of the conservation objectives) ensures that adverse effects on integrity of Strensall Common SAC cannot be ruled out. In consequence, to avoid any adverse effects on the integrity of Strensall Common SAC, the HRA (Feb 2019) recommended that the proposed site allocations ST35 and H59, and strategic Policy SS19, were removed from the submitted Local Plan.
- 4.3.3 The Council, as the competent authority, could therefore no longer conclude that the proposed site allocations ST35 and H59 (and Policy SS19) would not undermine the conservation objectives for Strensall Common SAC. The Council proposes therefore to delete these elements from the draft Local Plan. Underpinned by the evidence within the HRA (Feb 2019), the Council considered that sites ST35 and H59 had to be removed in their entirety because there is no meaningful way to mitigate the effects of recreational pressure on Strensall Common SAC arising from the smaller site allocation (H59) either on site or in combination with the larger site allocation ST35, and it would be difficult to limit access to the common given the proximity to the Scott Moncrieff Road car park.⁵²

⁵¹ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

⁵² City of York Council Committee Report and decision – Executive meeting 7th March, 2019 available via: <https://democracy.york.gov.uk/ieListDocuments.aspx?Cid=733&Mid=10479&Ver=4>

5. Summary appraisal of effects

5.1 Introduction

- 5.1.1 This section reflects on the outcome of the screening of the proposed changes to the Local Plan (set out in **Appendix A**), and the appraisal of the housing growth, strategic sites, local sites, strategic and thematic policies, and the Local Plan cumulatively (**Appendices B to G**).
- 5.1.2 Section 5 of the SA Report (2018) identifies, describes and appraises the likely significant effects of each of the key stages of the Local Plan development. It documents the process of the selection and refinement of the preferred development option leading up to the submission of the draft plan. This is not repeated here.
- 5.1.3 This section summarises the findings of the review of the proposed modifications to identify those changes that have been screened in for appraisal. This section then summarises the sustainability implications of the 'screened in' modifications to provide updates to the SA. These are summarised in **Section 5.3 to 5.6** and set out in **Appendices B to G**. Where appropriate, new text is underlined, and deleted text is indicated by ~~striketrough~~. Section 6 of the SA Report (Feb 2018) includes a commentary on the performance of each chapter of the Local Plan against the SA Objectives. A commentary is provided on whether or not it is necessary to update the text and updated text is provided in those instances where it is.

5.2 Identification of potentially significant Proposed Modifications

- 5.2.1 **Table 5.1** below identifies the potentially significant modifications to the Publication Draft Local Plan. The results of the review of all such modifications are set out in **Appendix A**. The subsequent sections present updates, as relevant, to the SA Report (Feb 2018) and SA Report Addendum (April 2018).

Table 5.1 Summary of Proposed Modifications to the Publication Draft Local Plan that are considered significant

Proposed Modification reference(s)	Key reference in Publication Draft Local Plan	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
PM3 PM4 PM5 PM20a to PM20d PM21a to PM21d PM22	Policy SS1: Delivering Sustainable Growth for York Para 2.5 / explanation Policy H1: Housing Allocations Explanation Figure 5.1 / Table 5.2/ Para 5.9	Amendment to policy and supporting text, including housing trajectory, to change the housing requirement in the plan to 790 dwellings per annum rather than 867.	The proposed modifications to the housing requirement and supporting text in SS1 and H1 reflect the latest housing need evidence in the Housing Needs Update, January 2019 (GL Hearn). The publication plan preferred housing figure and reasonable alternatives were appraised in the SA Report (Feb 2018). The appraisal should be reviewed and updated to reflect the proposed change to the housing figure and latest evidence.
PM6 PM8 PM11 PM18 PM19 PM39	Policy H1: Housing Allocations Site Allocation H59 Strategic Site Allocation ST35 Policies Map North - Strensall Village	Deletion of site allocation H59 Deletion of site allocation ST35	The proposed modifications see the deletion of a strategic site (ST35) and general housing site (H59) following the conclusions of the HRA (Feb 2019). The implications for the SA due to the proposed deletion should be reviewed and the SA Report should be updated to reflect the deletion. Implications for

Proposed Modification reference(s)	Key reference in Publication Draft Local Plan	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
	Consequential explanatory cross reference in Policy SS10: Land North of Monks Cross; Policy SS12: Land West of Wigginton Road; Policy SS13: Land West of Elvington Lane		housing supply from deletion of site should also be reviewed.
PM9 PM10	Policy SS13: Land West of Elvington Lane	Amendments to policy criterion regarding open space.	The proposed modifications are not considered significant in themselves. However, the policy was re-appraised in the SA Report Addendum (April 2018) in light of the HRA (April 2018). The implications of the updated HRA (Feb 2019) for the policy appraisal against SA Objective 8 (biodiversity) should be reviewed.
PM12	Policy SS18: Station Yard, Wheldrake	Clarification regarding the mitigation required linked to the HRA (Feb 2019).	The proposed modifications are not considered significant in themselves. However, the policy was re-appraised in the SA Report Addendum (April 2018) in light of the HRA (April 2018). The implications of the updated HRA (Feb 2019) for the policy appraisal against SA Objective 8 (biodiversity) should be reviewed.
PM13 PM14	Policy SS19: Queen Elizabeth Barracks, Strensall	Deletion of policy linked to the deletion of site ST35.	The proposed modification sees the deletion of a strategic policy due to the proposed deletion of the strategic site (ST35), following the conclusions set out in the HRA (Feb 2019). The implications for the SA due to the proposed deletion should be reviewed and the SA Report should be updated to reflect the deletion.
PM16	Policy EC1: Employment Allocations	Modification to footnote for site E18 that was proposed in the schedule of modifications to the submitted plan (25 th May) following removal of ST35.	The proposed change in May 2018 (CD003) led to a reappraisal of Policy EC1 as set out in the SA Report Addendum (April 2018). The appraisal commentary was also updated to reflect the HRA (April 2018). The appraisal against SA Objective 8 (biodiversity) should be reviewed to consider the implications. The commentary should also be updated to reflect the updated HRA (Feb 2019).
PM24	Policy D1: Placemaking	Addition policy wording to clarify that residential amenity should be considered as part of overall design standards as part of the planning process.	The proposed modification sees additional wording included to avoid negative effects on residential amenity. The appraisal against health (SA Objective 2) should be reviewed.
PM26	Policy GI2: Biodiversity and Access to Nature	Addition of three criteria to include reference to internationally and nationally designated conservation sites.	The proposed modification introduces new policy criteria related to designated sites. The policy was appraised as having 'significant positive' effects on biodiversity (SA Objective 8) and the change reinforces these positive effects. However, the appraisal commentary should be reviewed to ensure consistency with the proposed change.
PM45 PM46	Table 5.2 Delivery and Monitoring	Introduction of additional indicator (and associated target) regarding visitor	Appendix J of the SA Report (Feb 2018) included indicative monitoring indicators for the SA

Proposed Modification reference(s)	Key reference in Publication Draft Local Plan	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
		numbers at Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC	Objectives. The new monitoring indicator should be reflected in this SA Report Addendum.

5.3 Housing requirement

- 5.3.1 The proposed change to the housing requirement (set out in the proposed change to Policy SS1) has been appraised against the SA objectives in accordance with the approach set out in Section 3. The findings of the appraisal are presented in **Appendix B**. This section summarises the likely effects of the preferred growth figures and the reasonable alternatives.

Appraisal of the proposed housing growth figure and reasonable alternatives

Considered Housing Growth Options

- 5.3.2 Section 6.4 of the SA Report (Feb 2018) set out the rationale for the alternatives appraised at Publication Draft Plan stage. This report does not repeat the SA Report (Feb 2018). For the purposes of this Report, the appraisal has considered the proposed housing requirement of 790 dwellings per annum based on the Housing Needs Update, January 2019 (GL Hearn) and the options considered at Publication Plan stage. Therefore, the following four housing requirement options have been appraised:
- **Proposed housing figure:** 790 dwellings per annum (dpa) - Based on the Housing Needs Update, January 2019, prepared for the Council by G L Hearn.
 - **Publication Draft Preferred housing figure:** 867 dwellings per annum (dpa) – Ministry for Housing and local Government (MHCLG) Baseline based on the 2014 based household projections, released July 2016.
 - **Reasonable Alternative:** 953dpa – GL Hearn recommended figure (SHMA update, 2017). This reflects the demographic starting point of 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing, in line with NPPG’s guidance for reasonable adjustments to the household projections to be made in light of market signals which may include land prices, house prices, rents, affordability, the rate of development and overcrowding.
 - **The Government’s indicative 2017 consultation housing need figure:** 1,070dpa – as set out in the *Housing Need Consultation Data Table*⁵³ published for consultation by MHCLG in September 2017 as part of *Planning for the right homes in the right places: consultation proposals*⁵⁴. This includes the household projections baseline at the time with an upwards adjustment based on the Government’s proposed formula for taking account of housing affordability ratios. The figure for dwellings per annum is for the period 2016-2026.

⁵³ MHCLG (2017) Available via:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644783/Housing_Need_Consultation_Data_Table.xlsx

⁵⁴ MHCLG (2017) Planning for the right homes in the right places: consultation proposals. Available via:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

- 5.3.3 As set out in Section 3, the evidence that informed the appraisal of the options at the Publication Plan stage has been superseded by the Housing Needs Update, January 2019 (GL Hearn). Therefore, the figures appraised at Publication Plan stage have been re appraised to reflect the latest evidence (i.e. that the housing requirement can now be met by a Local plan provision of 790 dpa).

Summary of changes identified to the appraisal presented in the SA Report (Feb 2018)

- 5.3.4 A minor change has been identified in appraisal of the Publication Draft figure (867dpa). At Publication Draft stage the appraisal found minor positive effects against SA Objective 1 (housing) in the short and medium term and minor negative effects in the long term. As set out in Section 6.4 and Appendix N of the SA Report (Feb 2018) the identification of minor effects in the long term was linked to the Publication Draft figure not meeting the identified Objectively Assessed Need (OAN) set out in the SHMA 2017 Update in line with the NPPF (2012) and NPPG.
- 5.3.5 The change in requirement to 790 dpa proposed as part of the changes reflects the publication of the Housing Needs Update, January 2019 (GL Hearn) prepared for City of York Council by GL Hearn. The figure is based on an economic-led objectively assessed housing need and is in excess of the baseline housing need with a 15% uplift for market signals (557dpa). Within the context of this latest evidence of housing need for the City of York, the housing figure included in the Publication Draft is therefore now assessed as having likely minor positive effects in the long term as well as the short and medium term.
- 5.3.6 No other changes to the scoring identified in the appraisal of the alternatives presented in the SA Report (Feb 2018) have been found. Several changes to the commentary have been made. The findings of the appraisal are presented in **Appendix B**. The following sections summarise the findings of the appraisal and update paragraphs 6.4.10 to 6.4.36 contained in the SA Report (Feb 2018).

Summary of the proposed housing figure (790dpa)

- 5.3.7 The proposed housing requirement of 790 dwellings per annum is based on the economic led housing need figure using identified in the Housing Needs Update, January 2019 (GL Hearn). The figure is higher than the demographic baseline of 484dpa and adjusted for market signals figure of 557dpa (a 15% uplift) and will contribute towards meeting housing needs across the City and enable the delivery of a range of housing types. The proposed housing figure is therefore assessed as having positive effects on housing (Objective 1) in the short, medium and long term.
- 5.3.8 The proposed housing figure has been appraised as having minor positive effects on education and skills (Objective 3) and jobs and growth (Objective 4). This is the result of stimulating investment in construction, supporting the delivery of projected jobs growth across the city economic investment, and in the longer term that new housing (and associated population increase) would support the viability and vitality of centres. The preferred option has also been assessed as having minor positive effects on access and equality (Objective 5) due to the potential for new housing to improve the viability and vitality of existing services, including retail.
- 5.3.9 Mixed positive and negative effects were identified in relation to transport (Objective 6). This reflects the likelihood that housing development will increase traffic within the City of York but that it may also present opportunities to increase investment in transport infrastructure, and support development in the most sustainable locations, which could reduce the need to travel by private car.
- 5.3.10 The proposed housing figure was assessed as having a minor negative effect on improving the health and well-being of York's population (SA Objective 2) arising from short term construction activity as well as the medium and long term effects on air quality from vehicle emissions. It is considered that the scale of growth has the potential to have both temporary adverse health

impact associated with construction works, particularly where new housing development is delivered close to existing residential areas, and longer term effects when dwellings are occupied. Further adverse effects may be generated where new housing sites are located in locations identified as Air Quality Management Areas or locations which have limited accessibility to health care facilities or are remote from other social infrastructure / employment locations reducing the opportunity for walking or cycling. This is dependent on the location of development.

- 5.3.11 The assessment identified the potential for the preferred housing growth figure to have minor negative effects on climate change (SA Objective 7), water (SA Objective 10), waste and resource use (SA Objective 11) and air quality (SA Objective 12). This primarily reflects the use of resources required to support housing growth and generation of waste both during construction and once dwellings are occupied as well as the potential for increased traffic and congestion.
- 5.3.12 Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, land use (Objective 9), cultural heritage (SA Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth.
- 5.3.13 It is likely that the negative effects identified would be lessened through the implementation of policies contained within the Local Plan which seek to protect environmental assets and to minimise/mitigate adverse effects associated with new development as well as through the appropriate location of development. In this respect, the site allocations criteria used should ensure that new housing development is directed to locations that:
- reduce the need to travel and/or encourage the use of sustainable modes of transport;
 - avoid adverse impacts on the City's built and natural environmental assets;
 - avoid locations that could exacerbate existing health issues (e.g. AQMAs);
 - make best use of previously developed land and avoid development in the floodplain;
 - incorporate service provision where possible.

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

Summary of the Publication Draft Preferred Figure Appraisal (867dpa)

- 5.3.14 The Local Plan Publication Draft preferred figure of 867 dwellings per annum was based upon the projected household growth using DCLG 2016 subnational projections. The figure has been appraised as having similar effects on housing (SA Objective 1) as the proposed figure of 790dpa. The delivery of housing in line with this figure would exceed the baseline housing need identified and meet the economic led figure identified in the Housing Needs Update, January 2019 (GL Hearn).
- 5.3.15 The preferred option has been appraised as having minor positive effects on education and skills (Objective 3) and jobs and growth (Objective 4). This is the result of stimulating investment in construction and in the longer term that new housing (and associated population increase) would support the viability and vitality of centres and support economic investment. The preferred option has also been assessed as having minor positive effects on access and equality (Objective 5) due to the potential for new housing to improve the viability and vitality of existing services, including retail.
- 5.3.16 The Publication Draft figure was found to have similar effects to the proposed preferred figure (790dpa) for the remaining SA Objectives.

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

- 5.3.17 The SHMA 2017 Update reasonable alternative (953dpa) has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing in the long term (SA Objective 1). The figure includes a 10% uplift for market signals on the 2016 SHMA baseline (the Publication Draft preferred figure). Significant positive effects have also been identified with regard to creating jobs and delivering growth of a sustainable, low carbon and inclusive economy (Objective 4), and helping to deliver equality and accessibility for all (Objective 5) in the long term. This assessment is predicated on the basis that the level of growth set out in the alternative will generate economic benefits in the short, medium and long term, both associated with construction and in the longer term new housing and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.
- 5.3.18 This alternative housing figure has been assessed as having similar effects to the Publication Draft preferred option for the remaining objectives. Mixed positive and negative effects were identified in relation to transport (Objective 6) whilst minor negative effects were identified for climate change (Objective 7), water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12). Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, land use (Objective 9), cultural heritage (SA Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth.
- 5.3.19 The alternative housing figure has been assessed the same as the proposed preferred housing figure for the remaining objectives. Mixed positive and negative effects were identified in relation to transport (Objective 6) whilst minor negative effects were identified for climate change (Objective 7), water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12). There is some uncertainty with regards to air quality (Objective 12). The effects on health (SA Objective 2) may provide some positive benefits as delivery of new housing at a higher scale of growth (particularly affordable housing) may help towards the improvement of housing stock and enable people to move from poor quality housing to newer properties although this is uncertain and overall it is considered to have minor negative effects. Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, land use (Objective 9), cultural heritage (SA Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth.

Summary of Appraisal of the Government's 2017 Consultation Housing Need Figure (1,070dpa)

- 5.3.20 The Government's 2017 consultation figure option uses the same starting point as Publication Draft figure (the 2016 subnational household projections). Step 2 of the Government's proposed methodology (adjusting for market signals) involved applying a formula for increasing the baseline projections related to local median house price affordability (as described in previous section above). This leads to a substantial increase in housing need above the baseline projections. The Government's consultation figure option has therefore been assessed as having significant positive effects on housing (SA Objective 1) in the medium and long term. The figure would significantly exceed the updated 2019 baseline of housing need in the City and account for affordability (based on the Government's proposed adjustment methodology). This is expected to help ensure that the needs of the City of York population would be met. There is some uncertainty related to the Government's need figure in the long term as it relates to the period 2016-2026. However, for the purposes of comparison it is assumed that the rate of housing need would continue for the Plan period.

- 5.3.21 The Government's consultation figure option is considered to have significant positive effects on educational and skills (SA Objective 3) in the long term and jobs and growth (SA Objective 4) in the medium and long term. This assessment is predicated on the basis that the level of growth has the potential to stimulate significant investment in educational services, through the creation of demand and commensurate developer contributions. The scale of growth in this option would also lead to significant economic benefits for the City. This would include direct benefits for the local construction industry as well as supporting investment in services and facilities whilst enhancing the viability and vitality of businesses in the City of York and other town centres. The Government's consultation figure option is therefore also considered to have significant positive effects in the medium and long term in relation to equality and access (SA Objective 5).
- 5.3.22 Mixed minor positive and significant minor effects have been found for sustainable transport (SA Objective 6) in the long term with a mix of minor positive and negative in the short and medium term. Although there are likely to be opportunities to support sustainable transport measures and generate investment in integrated transport solutions, linked to the scale of housing need, there are also likely to be significant negative effects related to the increase in population and private car use, especially cumulatively in the longer term. In line with the assessment against SA Objective 6, the likely negative effects on climate change are also assessed as minor in the short and medium term and significant in the long term.
- 5.3.23 The Government's 2017 consultation figure option is assessed as having a minor negative effect on improving the health and well-being of York's population in the short, medium term and long term (SA Objective 2). However, the increased scale of growth may support positive effects by enabling those in poor housing to move to new properties. This is uncertain though.
- 5.3.24 The Government's consultation figure option is assessed as having negative effects on green infrastructure and biodiversity (SA Objective 8). The effects associated with the Government's consultation housing figure option are likely to be significant in the long term due to the scale of development and associated land take although there is uncertainty due to the location of development and is dependent on any site specific proposals that come forward to meet the housing need.
- 5.3.25 The effects on land resources (SA Objective 9) are assessed as being significantly negative in the medium and long term. This reflects that the Government's consultation housing figure option would require greater land take (particularly greenfield land) than the two other options. However, this effect is to some extent dependent on the location of development (and the take up of previously development land) whilst higher development densities could also mitigate some of the negative effects. Minor negative effects have been identified for water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12) although there is some uncertainty for water resources and air quality in relation to the location of development. The effects on water may be greater in the long term dependent on the implementation of water efficiency measures. For cultural heritage (SA Objective 14) and landscape (Objective 15) negative effects have been assessed. The effects may increase relative to the scale of development associated with meeting the housing need figure. Although there may be greater pressure on these assets, due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth, this may be lessened and mitigated by the location and design of development and the policies contained within the Local Plan which seek to protect environmental assets.

Conclusion

- 5.3.26 Given the significant positive effects identified for the 2017 SHMA recommended alternative figure against the SA objectives for housing (Objective 1), employment (Objective 4) and equality of access (Objective 5) (with a similar performance for the remaining objectives to the proposed preferred housing figure of 790dpa and Publication Draft figure of 867dpa), the 2017 SHMA

Update figure is considered to perform marginally better in sustainability terms than the proposed figure.

- 5.3.27 In comparison to the proposed preferred housing figure (790dpa), Publication Draft growth option (867 dpa) and SHMA 2017 Update figure (953 dpa), the Government's 2017 consultation figure option (1,070 dpa) is likely to have greater effects (both in terms of positive and negative effects) than these other options. Comparison of the likely effects would suggest that the Government's 2017 consultation figure option would provide greater positive effects on housing (SA Objective 1), education and skills (SA Objective 3), the economy (SA Objective 4) and access and equality (SA Objective 5). The significant effects are likely to be seen in the medium and long term.
- 5.3.28 However, the effects of the Government consultation figure option on the environmental objectives would be likely to be greater than the proposed preferred figure (790dpa), the Publication Draft figure (867dpa) and SHMA 2017 Update (953dpa). The negative effects associated with transport (SA Objective 6) and climate change (SA Objective 7) are likely to be significant whilst there are also likely to be greater negative effects on biodiversity (SA Objective 8) and land resources (SA Objective 9). Due to the higher level of housing need envisaged in the Government's 2017 consultation figure there is also potential for greater negative effects on cultural heritage (SA Objective 14) and landscape (SA Objective 15).

Reasons for selection of the preferred 790dpa figure

- 5.3.29 The following information regarding the reasons for selection of the preferred housing requirement has been provided by the Council.
- 5.3.30 York's proposed updated economic led objectively assessed local housing (OAN) need is 790 dpa, underpinned by the Housing Needs Update, January 2019 (GL Hearn). The revised figure of 790 dpa updates the 867 dpa that was included within the Local Plan Publication Draft (2018) submitted for examination on 25th May 2018.
- 5.3.31 The Housing Needs Update, January 2019 (GL Hearn) is prepared in accordance with the PPG under the NPPF (2012), applying transitional arrangements, and is a detailed review of the latest national and sub-national 2016 based population and household projections and the latest mid-year population estimates. It therefore takes account of the latest 2016 based population projection data which sees a lower increase in York's projected population over the plan period than the previous 2014 based projections that underpinned the previous OAN calculations for York. It concludes that 790 dpa would be sufficient to respond to market signals, including affordability adjustments, and make a significant contribution to meeting affordable housing needs.
- 5.3.32 The updated housing needs evidence and proposed changes to the Plan were approved for submission to the Examination by the Corporate Director of Economy and Place in consultation with relevant members, in accordance with the delegated authority from Council⁵⁵. Excepting the changes arising from the updated HRA which proposes the deletion of sites ST35 and H59 (550 dwellings), the remaining supply of sites chosen to meet the need has not changed. The Council considers that the submitted Plan's housing supply can meet the revised OAN of 790 dpa, both for the plan period to 2033 and the post plan period to 2038. It is considered that the proposed housing supply in the submitted Plan includes an appropriate level of flexibility in order to deal with unforeseen circumstances over the duration of the Plan. Whilst the flexibility in the proposed housing supply has increased by approximately 1,500 dwellings as a consequence of the reduction in the OAN, it is considered that this additional flexibility is warranted due to the need for increased flexibility in supply to help future proof the Plan in the context of any Local Plan review, undertaken

⁵⁵ City of York Council Decision details 29th January 2019. Available via: <https://democracy.york.gov.uk/ieDecisionDetails.aspx?ID=5449>. This was also considered by the LPWG on 27th February 2019 and Executive on 7th March 2019. Report available via: <https://democracy.york.gov.uk/ieListDocuments.aspx?Cid=733&Mid=10479&Ver=4>

under the revised NPPF (2019). The proposed supply will create a Green Belt boundary for York which will endure beyond the end of the Plan period to meet longer term development needs.

- 5.3.33 The Council therefore considers that the proposed figure of 790dpa meets the NPPF (2012) requirements for local plans to ensure that the full, objectively assessed need for their area is met, is based on the most up-to-date population and household growth evidence for the City of York, and is the most appropriate housing figure for inclusion in the Local Plan.

Reasons for rejection of alternatives

- 5.3.34 The following information regarding the reasons for rejection of the alternatives to the preferred housing requirement has been provided by the Council.
- 5.3.35 In July 2017, the Council's Executive considered the GL Hearn 2017 Draft SHMA Update (July 2017), which recommended a further 10% uplift to the 867dpa figure for market signals (to 953 dpa). The Executive resolved that the figure of 867dpa be taken forward in the Local Plan. The Executive's reason for this was that the conclusions in the SHMA were "*speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.*"⁵⁶ The SHMA 2017 Update alternative housing figure of 953 was therefore rejected. A Pre-Publication Draft was then the subject of a six week consultation period.
- 5.3.36 In January 2018, the Executive⁵⁷ considered the responses to the Pre-Publication Draft, the implications of the Government's consultation on a methodology calculating 5 year housing supply (indicating 1,070dpa), and the Government letter highlighting York as a City at risk of Government intervention unless progress with the Local Plan could be demonstrated.
- 5.3.37 Officers recommended to the Executive that, in light of the direction of travel in national policy, and the need to demonstrate progress in the plan making process, the Council would be in a more robust position if the scale of housing proposed at a number of existing proposed allocations were increased. However, this had to be balanced with the need to progress the Plan, and consideration given to whether further consultation would be required for these changes. Members only accepted increases to existing proposed strategic allocations. This decision was taken by Members, informed by an analysis of the Pre-Publication consultation responses, an understanding of the risk that further changes to the Local Plan could delay plan progress and the judgement that the previously agreed housing figure would provide the appropriate balance between the need for growth with York's unique historic character and setting. The Council's Executive therefore determined that the figure of 867 dpa was supported for inclusion in the Local Plan Publication Draft (Feb 2018) and that the higher figure suggested by the Government's 2017 consultation (1,070 dpa) was not appropriate.
- 5.3.38 Since the submission of the draft Local Plan (May 2018), there have been two changes which have affected national housing policy: the national population and household projections which form the basis of the local housing need assessment have been updated; and the Government have brought into force a standard method for calculating housing need linked to the publication of the revised NPPF (2018 with update in 2019).
- 5.3.39 Both the NPPF (2012) and the associated PPG with regards to housing needs assessments are clear that the latest household projections published by the Office for National Statistics (ONS) should provide the starting point estimate of overall housing need. The PPG is clear that wherever possible, local needs assessments should be informed by the latest available information and the NPPF is

⁵⁶ City of York Council Committee Report and decision – Executive meeting 13th July, 2017 available via: <http://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=10188&Ver=4>

⁵⁷ City of York Council Committee Report and decision – Executive meeting 25th January, 2018 available via: <http://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=10195&Ver=4>

clear that Local Plans should be kept up-to-date. It is also clear that *“a meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued”*.

- 5.3.40 The Office for National Statistics (ONS) released revised sub national population projections (2016-based) in May 2018 post the submission of the York Local Plan which show a marked discrepancy with the previous 2014 based figures on which the submitted Plan’s OAN was calculated. This was further confirmed by the release of the 2016 based sub-national household projections by ONS in September 2018.
- 5.3.41 Regarding the standard method for calculating housing need, the York Local Plan is subject to the transitional arrangements as set out in the NPPF (2019) and is therefore being examined against the original NPPF (2012), and in consequence the standard method is not applicable. This was confirmed by the Inspectors in their letter⁵⁸ to the Council on 14th December 2018. This states that *“this examination is being conducted pursuant to the ‘transition arrangements’ in the NPPF 2018 [noting that this reference has now been superseded by the NPPF 2019]. As such, it is the policies of the 2012 NPPF that apply. The 2012 NPPF requires that an OAN figure be identified. But there is nothing in Government policy or guidance requiring that Local Plans being examined under transitional arrangements must use the standard method”*.
- 5.3.42 As noted above, York’s objectively assessed housing need has been updated, based upon the Housing Needs Update, January 2019 (GL Hearn). This has been prepared in accordance with the PPG and is consistent with the NPPF (2012). The update concludes that 790 dpa would be sufficient to respond to market signals, including affordability adjustments, and make a significant contribution to meeting affordable housing needs. To be justified under the NPPF 2012, the Local Plan needs to be based on a proportionate evidence base (defined⁵⁹ as *“adequate, up-to-date and relevant”*). The previously preferred housing requirement figure of 867 dpa has therefore been superseded as it is no longer consistent with the requirement to be up-to-date.
- 5.3.43 The Council therefore considers that the alternatives appraised (867 dpa, 953 dpa and 1,070 dpa) do not provide as robust a basis for setting the housing requirement in the Local Plan as the preferred housing requirement of 790 dpa.

5.4 Spatial Strategy

Spatial Strategy policies

- 5.4.1 The proposed changes to the Spatial Strategy policies are set out in **Table 5.1** and **Appendix A**. 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. This appraisal was updated in the SA Report Addendum (April 2018) following the update of the HRA (April 2018) and Appropriate Assessment.
- 5.4.2 The proposed changes to Policy SS1: Delivery Sustainable Growth for York reflect the inclusion of the proposed preferred housing figure of 790dpa. The updated appraisal of the policy reflects on the new housing need evidence which has superseded that in places at the time of the Publication Draft. The full implications for the consideration of the housing growth and the changes to the appraisal have been set out in **Section 5.3**. Similarly, there is a change in the appraisal of SS1. The appraisal found that the policy has positive effects against housing (SA Objective 1) in recognition

⁵⁸ Letter from Simon Berkeley and Andrew McCormack, Inspectors to Neil Ferris, City of York Council, dated 14th December 2018, available at: https://www.york.gov.uk/downloads/file/17204/exins2_inspectors_initial_observations_14_dec_2018

⁵⁹ MHCLG (2012) National Planning Policy Framework, paragraph 158

that the policy delivers the full economic led housing need identified in the Housing Needs Update, January 2019 (GL Hearn) report. At Publication Draft stage the SA Report (Feb 2018) found a mix of minor positive and minor negative effects against housing, linked to evidence in the SHMA 2017 Update (as discussed in more detail in Section 5.3). The re-appraisal found no negative effects against SA Objective 1. There are also implications for the cumulative appraisal (see Section 5.6).

- 5.4.3 The updated HRA Report (Feb 2019) means that some of the evidence supporting the SA Report (Feb 2018) and SA Report Addendum (April 2018) appraisal of the spatial strategy policies has effectively been superseded and, therefore, the appraisal of the policies has been reviewed (see **Appendix A** for proposed changes and **Appendix F**). The HRA (Feb 2019), following Appropriate Assessment, could not rule out adverse effects on the integrity of Strensall Common SAC. The proposed changes see the deletion of Policy SS19 to reflect the HRA (Feb 2019) findings. There are also proposed modifications to text to remove references to Policy SS19. The implications for housing supply are considered in Section 5.5.
- 5.4.4 The proposed modifications to Policies SS13 and SS18 are themselves not considered significant. However, the updated HRA (Feb 2019) means that some of the evidence supporting the re-appraisal against biodiversity (SA Objective 8) reported in the SA Report Addendum (April 2018) has effectively been superseded (even though its conclusions have been reconfirmed).
- 5.4.5 The proposed changes to Policy SS13 were assessed as having 'minor negative' effects on SA Objective 8 (biodiversity) in the SA Report Addendum (April 2018), recognising that although uncertainty may be removed with regards to mitigation for effects on the Lower Derwent Valley SPA, potential effects on Heslington Tillmire SSSI remain. The proposed modifications include no further changes for Policy SS13. No changes have been identified for the appraisal, but the commentary has been updated to reflect the HRA (Feb 2019).
- 5.4.6 No changes have been identified for the appraisal of SS18 and the original SA Report (Feb 2018) assessment of 'minor positive effects' for this policy remains. However, the appraisal commentary has been updated to reflect the HRA (Feb 2019).
- 5.4.7 The proposed deletion of cross references to site ST35 in policies SS10: Land North of Monks Cross; SS12: Land West of Wigginton Road; and SS13: Land West of Elvington Lane were not found to change the outcome of the appraisals of these policies.
- 5.4.8 To reflect the updated appraisal (and its associated effects on housing (SA Objective 1) paragraphs 6.5.7 and 6.5.8 of the SA Report (Feb 2018) should be amended to read as follows:

"The Spatial Strategy policies have been appraised as having ~~mixed~~ significant positive ~~and minor negative~~ effects on housing (SA Objective 1). The quantum of growth to be accommodated in the City of York is established principally through Policy SS1 (Delivery Sustainable Growth for York), reflecting the preferred housing and employment growth figures appraised in Section 6.5. Delivery is supported through policies SS3, SS4 and SS6 to SS20. SS1 sets out the housing requirement with the annual provision of ~~790867~~ new dwellings per annum over the plan period (equivalent to ~~12,640~~ 13,872 dwellings in the sixteen years between 2017/18 and 2032/33) and beyond (2032/33 to 2037/38). SS1 expresses this as a minimum requirement. The scale of development meets the projected economic led housing need for the City set out in the Housing Needs Update, January 2019 (GL Hearn) and is higher than the baseline housing need figure and adjusted figure with the application of a 15% uplift for market signals. ~~baseline household growth in the City over the plan period and is considered to be the objectively assessed housing need for the City. However, it does not reflect fully the upward adjustment made for market signals such as land prices, affordability etc outlined in the Strategic Housing Market Assessment (SHMA) update (2017) – prepared for the City of York Council by GL Hearn – using the 2016 CLG baseline sub-national projections (the SHMA technical work included a 10% upward adjustment is added to make a housing figure of 953dpa).~~

Whilst significant positive effects against housing (SA Objective 1) have been assessed in the short and medium term, minor negative effects have been assessed in the long term. SS1 expresses 867dpa as a minimum housing requirement which may well be exceeded, and potentially substantially so. Indeed, the presence and extent of any minor negative effects in the long term against this objective will be dependent on whether the minimum housing requirement (867dpa) is delivered within the plan period or whether it is exceeded. The potential for negative effects against this SA objective will diminish as the number of additional homes increases. To establish this will require effective and on-going monitoring of the plan's implementation. However, other policies in the spatial strategy (particularly SS3, SS4 and SS6 to SS20) are considered to have significant positive effects in delivery of a quantum of growth and a range of housing types, tenures and locations to support the City of York's needs.

5.4.9 To reflect the updated appraisal (and its associated effects on biodiversity (SA Objective 8) paragraph 6.5.14 of the SA Report (Feb 2018) should be amended to read as follows:

"Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of biodiversity assets), there is a significant opportunity to realise improvements to the City's green infrastructure network (including open space, biodiversity and geodiversity) through new provision, making links between existing resources and enhancing the management of resources, as well access enhancement generally. This is reflected in Policy SS1 and also through specific opportunities identified in policies SS4, SS6 and SS10 (for example). The spatial strategy policies have therefore been generally assessed as having a positive effect on biodiversity (SA Objective 8). However, the HRA Screening Assessment at Pre-Publication Plan stage identified that Policies SS13, SS18 and SS19 (which is now proposed to be deleted) SS19 had the potential for likely significant effects. The HRA (2017) assessed that the adoption of appropriate mitigation could remove the potential for likely significant effects on Lower Derwent Valley SPA in relation to SS18 (as reconfirmed in the updated HRAs (April 2018 and Feb 2019)) although it was not found possible to mitigate policies SS13 or SS19 and these will be subject to an appropriate assessment. The HRA process is iterative and ongoing work has been used to refine and revise the plan at Publication Plan stage. Additionally, the HRA (April 2018) (as reconfirmed in the updated HRA (Feb 2019)) concluded that, following Appropriate Assessment, Policy SS13 would not have an adverse effect on the integrity of any European sites. Ongoing work has identified appropriate mitigation to reduce effects as far as it can at this stage prior to the finalisation of the HRA Report. However, the SA must await the outcome of this further assessment. As a consequence, the appraisal has concluded uncertain effects against these two policies on SA Objective 8. Notwithstanding the above, in light of the residual effects on Heslington Tilmire SSSI, SS13 has been assessed as having minor negative effects against this objective. Therefore, a mix of positive and negative effects with uncertainty has been assessed for the policies overall."

Strategic sites

- 5.4.10 The proposed changes to strategic sites are summarised in **Table 5.1** above. The HRA (Feb 2019) concluded that, following Appropriate Assessment, it could not rule out adverse effects on the integrity of the Strensall Common SAC from strategic site ST35: Queen Elizabeth Barracks Strensall and recommended removal of the site. The proposed change therefore sees the deletion of site ST35 from the draft Local Plan.
- 5.4.11 Based on the evidence regarding the effects of recreational pressure on the Strensall Common SAC contained in the HRA (Feb 2019), the Council⁶⁰ consider that the strategic site ST35 and local site H59 need to be removed in their entirety as there is no meaningful way to mitigate the effects of recreation on the common or limit access to the common. It was not considered that a reduction in

⁶⁰ City of York Council Committee Report and decision – Executive meeting 7th March, 2019 available via: <https://democracy.york.gov.uk/ieListDocuments.aspx?Cid=733&Mid=10479&Ver=4>

the site size would be a reasonable alternative to deletion, as the recreational pressures would remain present with a smaller site. Given that the proposed reduction in the housing requirement in effect leads to an increase in projected housing delivery above the requirement (discussed further in Section 5.5) it is not considered that additional sites (reasonable alternatives) for replacement of these deleted sites are required.

- 5.4.12 The updated HRA (Feb 2019) has reconfirmed the findings of the HRA (April 2018) in relation to sites ST13: Land west of Elvington Lane and ST33: Station Yard, Wheldrake. The changes contained within the proposed modifications (for the corresponding strategic policies) were appraised in the SA Report Addendum (Apr 2018). The summary of effects set out in Section 4.2 of that report therefore remain relevant for the proposed modifications. 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. Following Appropriate Assessment, the effects on European sites considered under biodiversity (SA Objective 8) can be mitigated for sites ST13 and ST33 through implementation of mitigation in policies within the Local Plan Publication Draft (as proposed to be modified). However, ST15 is considered to still have uncertain effects on Heslington Tillmire SSSI.
- 5.4.13 No further changes to the appraisal of other strategic sites have therefore been identified (following the updates identified in the SA Report Addendum (2018)) but the appraisal commentary has been revised to take into account of the HRA Report (Feb 2019) (see **Appendix C** and **Appendix E** for site audit trail). The implications for the removal of the site on the delivery of the housing requirement are considered within Section 5.5.
- 5.4.14 **Table 5.2** updates the summary of site allocations and updates Table 6.2 of the SA Report (Feb 2018).

Table 5.2 Updated summary of the strategic sites appraisal

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

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

- 5.4.15 To reflect the removal of strategic site ST35 (and its associated effects on biodiversity (SA Objective 8) paragraph 6.5.31 of the SA Report (Feb 2018) should be amended to read as follows:

"York's abundance of European and local nature conservation designations as well as high potential for biodiversity has led to the majority of strategic sites being assessed as having a potentially minor negative effect on SA Objective 8 (Biodiversity). Significant negative effects were identified on ~~five~~four strategic sites. Two of these sites have local designations within 50m whilst the remaining ~~three~~ sites (ST15, ~~and~~ ST33 ~~and~~ ST35) aligns with the outcomes of the HRA ~~Screening~~ Report (2019~~7~~), which identified ~~that, following~~ Appropriate Assessment, adverse effects on the integrity of the Lower Derwent Valley SPA, breeding and non-breeding birds and mobile species would be avoided with the incorporation of policy mitigation that Appropriate Assessment is required to understand whether likely significant effects can be discounted. Significant effects are identified for ST15 and ST33 predominantly for their potential to have likely significant effects on the Lower Derwent Valley SPA and on ST35 given it is located adjacent to Strensall Common SAC designated for lowland heath, which is vulnerable to disturbance as a result of recreation. ST15 was still considered to have potential for significant effects on Heslington Tilmore SSSI. Effects on biodiversity for both minor and significant effects are expected to be mitigated through implementation of policies within the Local Plan Publication Draft although this is subject to implementation and in addition to site specific mitigation measures to be introduced at the detailed planning stage. Positive effects were identified on five sites where opportunities exist to enhance biodiversity on site."

Local sites

- 5.4.16 The proposed changes to local sites are summarised in **Table 5.1** above. The HRA (Feb 2019) concluded that, following Appropriate Assessment, it could not rule out likely significant effects on the integrity of the Strensall Common SAC from housing site H59: Queen Elizabeth Barracks – Howard Road and recommended removal of the site. The proposed changes therefore include the deletion of site H59 from the draft Local Plan. As set out in paragraph 5.4.11 above, the Council considers that there is no meaningful way to mitigate the effects of recreational pressure on the Strensall Common SAC and limit access to it through a reduction in the site. Therefore, they propose removal of the site in its entirety (along with ST35). No reasonable alternative housing sites are required as the projected housing supply is considered to be more than sufficient to meet the 790 dpa requirement (discussed further in **Section 5.5**).
- 5.4.17 The HRA (Feb 2019) concluded that, subject to amendments to policies EC1: Provision of Employment Land and GI2: Biodiversity and Access to Nature, employment site E18: Towthorpe will have no adverse effect on Strensall Common SAC. No changes are proposed to the site allocation itself.
- 5.4.18 The scoring for the sites set out in the SA Report (Feb 2018) is unaffected by the conclusions of the HRA (Feb 2019) with the exception of the removal of H59. The implications for the removal of the site on the delivery of the housing requirement is considered with **Section 5.5**.
- 5.4.19 Additionally, four new potential housing sites were received at the Publication Draft stage, one of which was amendment to the boundary of a previously assessed site. These sites have been appraised in line with methodology set out in **Section 2.5**. The appraisal outcomes are included in **Appendix D** and the reasons for site selection or rejection included in **Appendix E**.
- 5.4.20 There are no proposed changes related to Gypsy and Traveller or Student Housing sites.
- 5.4.21 **Table 5.3** updates the summary of site allocations and updates Table 6.3 of the SA Report (Feb 2018). **Appendix D** includes the appraisal of allocations and alternatives. **Appendix E** includes updated 'reasons for selection and rejection of sites' to account for the new sites appraised.

Table 5.3 Updated summary of proposed local site allocations

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

Call for Sites Ref	Local Plan Ref	Site Name	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
182	H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	++	++	++	0	+	+	-	--	0	0	0	0	-	-
472	H1	Former Gas Site 24 Heworth Green	++	++	++	0	++	+	-	++	0	0	-	-	-	0
656	H10	Barbican Centre	++	+	+	0	++	+	0	++	0	0	-	0	-	0
677	H38	Land RO Rufforth Primary School	+	+	+	0	+	+	0	--	0	0	0	0	0	0
828	H56	Land at Hull Road	+	++	++	0	++	+	0	+/-	0	0	0	0	-	0
832	H6	RO the square Tadcaster Road	0	+	+	0	++	0	0	-	0	0	0	0	-	-
853	H3	Revised Burnholme School	+	++	+	0	+	+	0	+/-	0	0	0	0	0	0
930	H31	Eastfield Lane Dunnington	+	++	-	0	+	+	0	--	--	0	0	0	0	0
936	H59	Queen Elizabeth Barracks Strensall – Howard Road, Strensall ⁶⁴	+	+	+	0	I	+	--	+/-	0	0	0	-	0	-

⁶⁴ Site H59 Queen Elizabeth Barracks Strensall – Howard Road, Strensall is adjacent to the Strategic Site ST35 but does not form part of the strategic allocation and has therefore been assessed separately as a local site allocation.

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

- 5.4.22 To reflect the removal of site H59 (and its associated effects on biodiversity (SA Objective 8) paragraph 6.5.44 of the SA Report (Feb 2018) should be amended to read as follows:

"A number of sites have been assessed as having a negative effect on SA Objective 8 (Biodiversity) with ~~two~~ one sites (H39: North of Church lane Elvington and H59: ~~Queen Elizabeth Barracks Howard Road, Strensall~~) identified as having a significant negative effect on this SA objective. This reflects its ~~their~~ close proximity (i.e. within 250m) to ~~statutory nature designations. In the case of H39 it relates to proximity to the Derwent River Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and for H59 it relates to Strensall Common Special Area of Conservation (SAC) and SSSI. The HRA Preliminary Assessment, in its commentary on H59, concluded that this site must be subject to HRA in order to assess the potential for likely significant effects arising from recreational pressure, changes to the hydrological regime and increased nitrogen deposition associated with increased traffic movements. For the remaining all sites, it is anticipated that any adverse effects on biodiversity could be mitigated through implementation of draft Local Plan policies. Significant negative effects have also been identified in respect of one site that is within 10m of a waterbody (H31: Revised Eastfield Lane Dunnington).~~"

- 5.4.23 To reflect the outcomes of the HRA (Feb 2019) and its evidence in relation to the assessment of associated effects on biodiversity (SA Objective 8), paragraph 6.5.50 of the SA Report (Feb 2018) should be amended to read as follows:

"Two sites, E10: Chessingham Park and E18: Towthorpe, recorded significant negative effects against the SA Objective 8 (Biodiversity). The negative effects were recorded due to their proximity to Statutory Nature Conservation Sites. For E18, the HRA (Feb 2019) found that, following Appropriate Assessment, the adverse effects on the integrity of Strensall Common SAC from recreational pressure would be avoided with the incorporation of mitigation in Local Plan policy. ~~The HRA Preliminary Assessment, in its commentary on E18, identifies that the Towthorpe site is in close proximity to the Strensall Common SAC. The preliminary assessment has concluded that this site must be subject to HRA in order to assess the potential for likely significant effects arising from recreational pressure, changes to the hydrological regime and increased nitrogen deposition associated with increased traffic movements. For the remaining sites, it is anticipated that any adverse effects on biodiversity could be mitigated through implementation of draft Local Plan policies.~~"

5.5 Thematic policies

- 5.5.1 The proposed changes to the thematic policies are summarised in **Table 5.1** above. 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. Section 4.5 and Appendix C of the SA Report Addendum (April 2018) reported on the appraisal of the proposed changes related to the HRA (April 2018). This section summarises the outcomes of the review of appraisal following the proposed changes to the draft Local Plan. See **Appendix A** and **Appendix G**.

Economy and retail

- 5.5.2 The proposed modifications to the economy and retail policies are summarised in **Table 5.1** above. Policy EC1: Provision of Employment Land was assessed as having 'uncertain' effects on SA Objective 8 (biodiversity) in the appraisal reported on in the SA Report (Feb 2018). Following proposed amendments considered in the SA Report Addendum (April 2018), the removal of uncertainty regarding effects on Strensall Common SAC saw the identification of neutral effects on biodiversity (SA Objective 8) (see section 4.5 and appendix C of the SA Report Addendum (April 2018)). The policy has been reappraised following the changes proposed following submission. No further changes to the appraisal have been identified.

Housing

- 5.5.3 The proposed modifications to the housing policies are summarised in **Table 5.1** above. An updated appraisal is contained in **Appendix G**. The proposed changes to Policy H1: Housing Allocations include the recognition of the proposed change to the housing figure in SS1 linked to the latest evidence of housing need, the deletion of strategic site ST35 and general housing site H59, and consequential changes to the housing trajectory.
- 5.5.4 Policy H1 was re-appraised and one change to the scoring identified in relation to housing (SA Objective 1) was identified. The policy was appraised as having minor positive effects on this objective. In the SA Report (Feb 2018) the policy was appraised as having likely mixed minor positive and minor negative effects linked to the appraisal of the Publication Draft housing requirement. The removal of negative effects against housing (SA Objective 1) reflects that the proposed changes to the policy ensure that a housing requirement that meets the identified housing needs of the City of York is being delivered (further consideration of the housing figure is set out in Sections 5.2 and 5.3).
- 5.5.5 The implications of the proposed deletion of the strategic housing site ST35 and local housing site H59 for the site appraisal are covered in Section 5.4. The deletion of sites will see around 500 dwellings lost from strategic allocations and 45 dwellings lost from the general housing allocations. Therefore, it is important to consider whether these proposed changes will reduce the ability of the allocations policy (H1) to deliver housing needs set out in the strategic policies.
- 5.5.6 The proposed changes include amendments to the housing trajectory which sets out the expected delivery of the housing requirement over the plan period (equivalent to 12,640 dwellings in the sixteen years between 2017/18 and 2032/33). The shortfall in delivery that may be expected from the deletion of a significant amount of housing at these sites is therefore counterbalanced by the reduction in housing required to meet the City's needs (i.e. the proposed modification to change the housing requirement from 867 dpa to 790 dpa). The deletion of the two sites is therefore not considered to have significant effects on the ability of Policy H1 to deliver the housing requirement (with housing delivery projected to exceed the requirement). Correspondingly, the deletion of the sites is not considered to undermine the identification of positive effects for Policy H1 against SA Objective 1.
- 5.5.7 To reflect the updated appraisal (and its associated effects on biodiversity (SA Objective 1) paragraphs 6.5.7 and 6.5.8 of the SA Report (Feb 2018) should be amended to read as follows:

"Policy H1 identifies those sites which have been allocated to meet the housing requirement set out in Policy SS1 (and policies H6 and H7 identify locations for Travelling Showpeople Sites and Student Housing respectively). As identified in Section 6.5, Policy SS1 identifies the quantum of growth to be accommodated in York, this includes a minimum annual provision of ~~867~~790 new dwellings over the plan period up to 2032/33. This equates to a requirement for ~~13,872~~12,640 dwellings in the sixteen years between 2017/18 and 2032/33. The delivery envisaged through H1 would help the plan meet and exceed this identified requirement. The policy has therefore been assessed as having a positive effect on the achievement of SA Objective 1 related to housing provision. In a similar way to the assessment of Policy SS1, although positive effects would be likely in the short and medium term there is likely to be minor negative effects in the long term as the delivery in H1 would meet the CLG baseline population and household growth projections but not fully meet the PPG compliant approach to the calculation of housing need in the City of York area (as set out in the Strategic Housing Market Assessment (SHMA) (2017 update) technical work prepared for the Council by GL Hearn). This is because the requirement does not include an upward adjustment of the baseline for housing market signals. Even with the shortfall for 2012-2017 annualised over the period (56dpa), the 'annual target' is below that identified with the SHMA (furthermore the SHMA figure of 953 would have to take account of the shortfall in any event leading to a nominal housing figure of 1,009dpa).

However, the presence and extent of the negative effects is dependent on the delivery of housing on the ground during the plan period above the housing figure. Careful monitoring is therefore required."

Placemaking, Heritage, Design and Culture

- 5.5.8 The proposed modification to this section is summarised in **Table 5.1** above. The change to Policy D1 sees an additional policy requirement related to ensuring residential amenity is protected through design. The policy was re-appraised against health (SA Objective 2). No changes to the appraisal were identified and the policy is still considered to have likely minor positive effects against this objective. However, the appraisal commentary has been revised to reflect the additional policy text.

Green Infrastructure

- 5.5.9 The proposed modifications are summarised in **Table 5.1** above. The proposed changes include the addition of a number of criteria to the Policy GI2 relating the internationally and national designated conservation sites. The appraisal of the policy was reviewed. No changes to the appraisal were identified.

Managing Appropriate Development in the Green Belt

- 5.5.10 The proposed changes to the draft Local Plan include a number of changes to the Inner Green Belt Boundary informed by a Green Belt Topic Paper Addendum. The proposed changes have been reviewed (see **Appendix A**) and those that are considered significant are set out in **Table 5.1**. The changes that relate to the removal of ST35 and H59 are considered significant and have been addressed in **Section 5.3 and 5.4**. Other proposed changes are minor and are not considered to have implications for the SA. There are also considered to be no implications for the Green Belt policies of the draft Local Plan.
- 5.5.11 There are no proposed changes to other policy sections of the draft Local Plan and, as such, no further changes are required to this section of the SA Report (Feb 2018).

5.6 Cumulative, synergistic and indirect effects

- 5.6.1 Section 6.7 of the SA Report (Feb 2018) outlined the total effects of the plan policies. The effects were re-appraised in the SA Report Addendum (April 2018) following a number of changes proposed at that stage linked to the HRA. Following the re-appraisal set out above, the cumulative effects table presented in Table 4.4 of the SA Report Addendum (April 2018) has been reviewed and updated (see **Table 5.4**).
- 5.6.2 The changes identified in the cumulative scoring are linked to the re-appraisal of policies SS1 and H1. The changes reflect the removal of negative effects due to these policy meeting the latest identified housing needs in the City of York area. No changes to the overall appraisal of other sections of the draft Local Plan against the SA Objectives have been identified.
- 5.6.3 Paragraph 6.7.3 of the SA Report (Feb 2018) should be amended to read:
- "Significant positive effects are expected in respect of the following topic areas: housing (SA Objective 1); health (SA Objective 2); education (SA Objective 3); economy (SA Objective 4); equality and accessibility (SA Objective 5); transport (SA Objective 6); climate change (SA Objective 7); cultural heritage (SA Objective 14); and landscape (SA Objective 15). ~~A mix of significant positive and minor negative effects are expected for housing (SA Objective 1).~~"*
- 5.6.4 Paragraph 6.7.6 of the SA Report (Feb 2018) should be deleted:

"Additionally, negative effects for housing (SA Objective 1) relate to the housing requirement in the Spatial Strategy and Housing chapter not meeting the full need (inclusive of market signals) identified in the SHMA update 2017. However, the presence and extent of such effects would depend on the delivery of housing through the plan period."

5.6.5 Additionally, paragraph 6.7.8 of the SA Report should be amended to read:

"Groups of sites have also been allocated towards the outskirts of the city and in the surrounding villages. The larger of these include an area south of Strensall (H59, E18, ST35) totalling some 620 new homes and 13,000m² of employment land. Additionally I to the east of the city are ST4 and ST27 totalling 211 houses and 21,500m² of employment floorspace. There are also a smaller outlying groups of sites at Elvington (H39 and E9) and Dunnington (H31 and E10). In addition to the cumulative effects already highlighted above, these locations on the edge of the city may particularly result in wider cumulative effects on the rural setting of the York as well as negative effects on landscape and local views."

Table 5.4 Updated results of the cumulative effects assessment

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

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		
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.
6. Transport	++	++/-	++	+	+	++	++	++	+	0	0	+	++	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. However, further development in key locations would generate more traffic which could lead to congestion, particularly within the urban area.
7. Climate Change	++	+/-	+/-	0/-	+	+	0	++	+	++	++	+	++	+/-	++/-	It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. This reflects the policy intent of the draft Local Plan to reduce greenhouse gas emissions (including through locating development in accessible locations that reduce the need to travel, sustainable design, renewable energy generation

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			
																	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 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

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			
																	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 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

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 effects on this objective resulting from the associated increase in vehicle use. This may be exacerbated in the City where some areas already have air quality issues.
13. Flood Risk	++	0/?	0	0	0	0	+	++	+	0	++	+	0	+	+		It is anticipated that the policies of the draft Local Plan would have a positive effect overall on the achievement of the SA objective.
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.

6. Conclusion

- 6.1.1 The screening found that the proposed modifications to the Local Plan provide a new housing requirement and ensure that the outcomes of the HRA (April 2019) are incorporated into policy. The changes also make minor amendments to Green Belt boundaries.
- 6.1.2 The screening has led to a reappraisal of policies SS1 and H1 (related to the updated housing need evidence) and SS13, EC1 and GI2 to reflect the HRA (Feb 2019). The HRA (Feb 2019) evidence also led to a review of the appraisal of sites ST13 and ST35.
- 6.1.3 The implications of the proposed deletion of strategic site ST35 and local housing site H59 (due the HRA (Feb 2019) finding that adverse effects on the integrity of Strensall Common SAC could not be avoided) have also been considered.
- 6.1.4 Changes to the cumulative appraisal have been identified for housing (SA Objective 1). It was identified that the spatial strategy and housing policies will have significant effects on housing due to the policies meeting the identified latest housing needs evidence.

6.2 Monitoring

- 6.2.1 It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the Local Plan will be monitored. Indicative proposed monitoring indicators were identified in Appendix L of the SA Report (2018). The proposed changes include the addition of a new Local Plan monitoring indicator regarding the designated conservation sites ("Change in visitor numbers at and condition of Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC") which should be reflected in the indicative monitoring framework.
- 6.2.2 The monitoring framework will be confirmed in the Post Adoption Statement following the close of the examination.

6.1 Next steps

- 6.1.1 This addendum to the SA Report (Feb 2018) is a supporting document to the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019). The Council is not inviting further comments on the submitted Plan where there are no proposed modifications.
- 6.1.2 Comments are invited on the findings and recommendations of this report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.
- 6.1.3 The consultation runs from **Monday 10th June** to midnight on **Monday 22nd July 2019**.

Your comments should be made using a representation form available to complete via York Council's website: www.york.gov.uk/localplan

Or alternatively please pick up a representation form from West Offices reception, York Explore or York Libraries. Please state clearly which Proposed Modification number (PM) or document your response relates to.

Appendix A

SA implications from the Proposed Modifications



Appendix B

Updated Appraisal of Housing Growth Figures





Appendix C

Updated Appraisal of Strategic Sites





Appendix D

Updated Appraisal of Allocations and Alternatives

- Housing





Appendix E

Updated Site Audit Trail





Appendix F

Updated Appraisal of Spatial Strategy Policies





Appendix G

Updated Appraisal of Thematic Local Plan Policies



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