

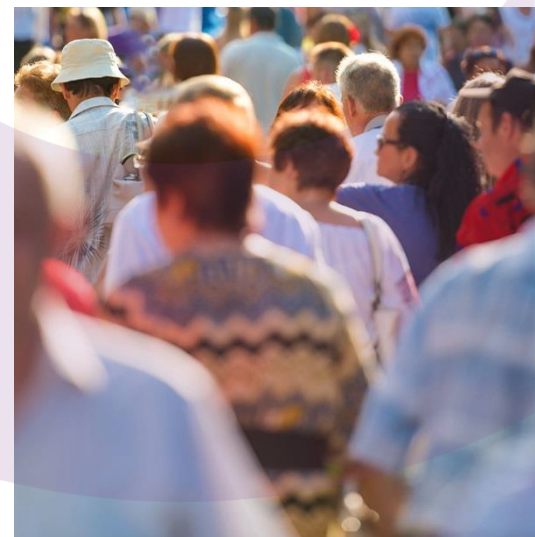
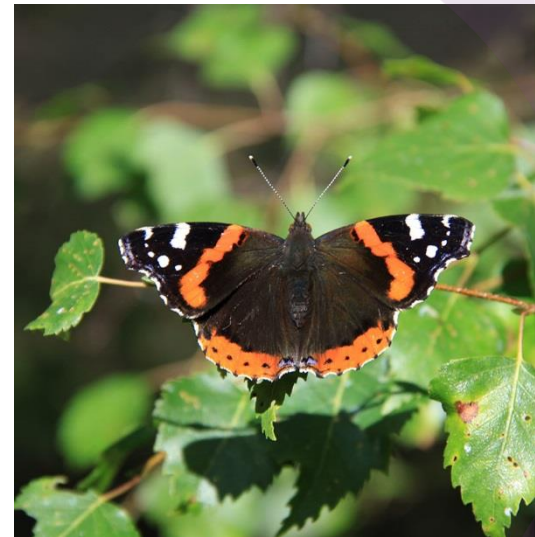


wood.

City of York Council

City of York Local Plan - Sustainability Appraisal

City of York Local Plan Publication Draft (Regulation 19 Consultation)
Sustainability Appraisal Report Addendum – Proposed Modifications
Consultation (May 2021)



Report for

Alison Cooke
Interim Forward Planning Manager
City of York Council
Strategic Planning
Directorate of Economy and Place
West Offices
Station Rise
York
YO1 6GA

Main contributors

Alison Cooke – CYC
Andrew Williamson

Issued by

.....
Andrew Williamson

Approved by

.....
Pete Davis

Wood Group UK Limited

Canon Court
Abbey Lawn
Abbey Foregate
Shrewsbury SY2 5DE
United Kingdom
Tel +44 (0) 1743 342 000

Doc Ref. 807118-WOOD-XX-XX-RP-T-00001_S4_P01.01

H:\Projects\807118 SA of Local Plan Examination Support\D
Design_Technical\Reports\May Addendum\Revised

Copyright and non-disclosure notice

The contents and layout of this report are subject to copyright owned by Wood (© Wood Group UK Limited 2021) save to the extent that copyright has been legally assigned by us to another party or is used by Wood under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report. The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of Wood. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

Third party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Wood at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Wood excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

Management systems

This document has been produced by Wood Group UK Limited in full compliance with our management systems, which have been certified to ISO 9001, ISO 14001 and ISO 45001 by Lloyd's Register.

Document revisions

No.	Details	Date
1	Draft	April
2	Final	May



Non-Technical Summary

Purpose of this report

This Non-Technical Summary (NTS) provides an overview of this May 2021 Sustainability Appraisal Report Addendum – Proposed Modifications Consultation.

The Council, with support from Wood Group 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.

Prior to the submission of the draft Local Plan for examination, the Council updated their evidence on Habitats Regulations Assessment (HRA) (April 2018)³ and identified a number of changes to the draft Local Plan⁴. Wood and the Council prepared a SA Report Addendum (April 2018)⁵ to appraise the changes related to the HRA (April 2018). The Council then consulted on a number of Proposed Modifications (PMs) prior to hearing sessions taking place as part of the examination. These were consulted on in the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019)⁶ which was accompanied by a SA Report Addendum (June 2019)⁷. These changes related to revised evidence on housing need, HRA and Green Belt.

The Council is now proposing a number of new modifications to the draft Local Plan linked to updates to the evidence base, including the HRA and Green Belt Topic Paper and as a result of the first set of examination hearings held in December 2019. Some of these PMs amend or supersede the changes appraised in previous SA Report Addenda. Others are newly identified.

The purpose of this addendum is to assess the likely significant effects of the PMs to the draft Local Plan contained within the City of York Local Plan Publication Draft – Proposed Modifications Consultation (May 2021) 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 – SA Report (February 2018), City of York Local Plan: Publication Draft – SA Report Addendum (April 2018) and City of York Local Plan: Publication Draft - SA Report Addendum (June 2019).

The following sections of this NTS:

- provide an overview of the City of York Local Plan Publication Draft;
- summarise the HRA and Green Belt evidence;

¹ Formally Amec Foster Wheeler Environment and Infrastructure UK Ltd and Wood 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 2019.

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

³ 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

⁴ 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.

⁵ Wood and City of York Council (April 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum

⁶ See details of consultation via: <https://www.york.gov.uk/LocalPlanModificationsConsultation>

⁷ Wood and City of York Council (June 2019) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum

- 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:

- 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 2013. 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 and which informed the Local Pre-Publication Plan that was issued for consultation 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 is being 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 proposed a number of modifications to the draft Local Plan linked to updated housing needs, HRA and Green Belt evidence base. The PMs (referenced as PM1-PM46) were consulted on within the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019). This was supported by an SA Report Addendum.

The Council is now consulting on a second set of PMs referenced as PM47 to PM102. This SA Report Addendum (May 2021) has been prepared to assess the implications for the SA of the PMs. It appraises the likely significant effects of the PMs to ensure that all the likely significant effects of the draft Local Plan (as proposed to be modified) have been identified, described and evaluated.

Update of the HRA and Green Belt evidence

HRA

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 sites⁸ 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)⁹.

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)¹⁰ 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). The Council therefore updated the HRA¹¹. This included the modelling of air quality impacts of additional traffic movements arising from new growth on ecological sites¹² (which was presented as an appendix to the HRA in April 2018).

An updated HRA Report was submitted to the examination in February 2019, which superseded evidence in the HRA (April 2018). 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. Section 4 of SA Report Addendum (June 2019) sets out a summary of the HRA Report (April 2018) and HRA (February 2019)¹³. This report does not seek to repeat the information presented.

An updated HRA Report (October 2020) was submitted to the examination in December 2020. The HRA (2020) confirms the findings of the 2019 HRA regarding the removal of Policy SS19 (site ST35) and site H59. In addition, in light of case law,¹⁴ Appropriate Assessment was undertaken of policies SS9 (site ST7), SS10 (ST8), SS11 (ST9) and SS12 (ST14). The HRA concluded that adverse effect on the integrity on the Strensall Common Special Area of Conservation (SAC) with regards to recreational pressure will be avoided if

⁸ 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.

⁹ '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.

¹⁰ Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

¹¹ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Habitats Regulations Assessment of the City of York Council Local Plan

¹² Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

¹³ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

¹⁴ People Over Wind and Sweetman v Coillte Teoranta (C 323/17) [2018] PTSR 1668

mitigation in the form of modification is included within the Local Plan policies. Natural England has confirmed agreement with the screening findings of the HRA (2020) and welcomed the PMs¹⁵.

This Report addresses the policy changes made in response to the update of the HRA (2020). The Report should be read alongside the SA Report (Feb 2018), SA Report Addendum (April 2018) and SA Report Addendum (June 2019). See **Section 3** for further detail about the HRA.

Green Belt

The Council submitted a Topic Paper¹⁶ to the examination in 2018 which set out the approach to defining the Green Belt across the City. The Council also prepared an Addendum in 2019¹⁷ in response to the Inspectors' request for the Council's more detailed justification of the boundaries. As part of the further work undertaken to produce the Addendum, and as a result of the proposed modifications required by the HRA (Feb 2019), the Council proposed a number of modifications to the Green Belt boundary identified in the 2018 Local Plan Publication Draft. These changes were consulted on the first City of York Local Plan Publication Draft – Proposed Modifications Consultation (2019) and screened in the accompanying June 2019 SA Report Addendum. The proposed changes were discussed at the first set of examination hearings in December 2019.

The Inspectors' letter of June 2020¹⁸ supported the Council's approach to Green Belt insofar as determining the general extent of Green Belt and the primary purpose to preserve the setting and special character of York. However, the Council have now produced an updated Green Belt Topic Paper Addendum (2021) to address concerns raised by the Inspectors in relation to the methodology. Whilst the level of proposed change as a result of this clarified Addendum is not considered significant, a number of changes to the boundaries have been proposed. This report addresses the proposed amendments. **Appendix A** sets out consideration of the proposed changes.

What is Sustainability Appraisal?

National planning policy¹⁹ 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 Plan²⁰. 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 UK regulations²¹ 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.

¹⁵ See Appendix J of the Habitats Regulations Assessment of the City of York Council Local Plan (letter dated 8th October 2020 from Natural England to City of York Council). Available via: <https://www.york.gov.uk/downloads/file/6297/ex-cyc-45a-hra-2020-appendices> [Accessed April 2021]

¹⁶ City of York Council (2018) Topic Paper 1: Approach to York's Green Belt

¹⁷ City of York Council (2019) Topic Paper 1: Approach to York's Green Belt Addendum

¹⁸ See: <https://www.york.gov.uk/downloads/file/5795/ex-ins-15-letter-to-lpa-12-june-2020> [Accessed May 2021]

¹⁹ 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).

²⁰ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

²¹ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

Determining the significance of the Proposed Modifications for SA

The PMs 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 PM:

- introduces a new policy;
- adds text to an existing policy such as the introduction of an additional criterion;
- deletes text from a policy;
- amends the supporting text clarifying how policies will be implemented.

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 4.2** (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

SA Objective

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, D and E**). 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 previous SA Report Addenda (April 2018 and June 2019) 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 4**. See **Appendix B to E** 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 land allocations including strategic sites and reasonable alternatives have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance (see **Table 2.3**). Reflecting their importance to the delivery of the Local Plan and capacity to generate significant effects, the proposed allocated strategic sites in the Local Plan Publication Draft and reasonable alternatives have also been subject to more detailed appraisal. The updated appraisal matrices for the relevant strategic sites (ST7, ST8, ST9 and ST14) are presented in **Appendix C**.

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	Plan section	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
PM47 PM48	Whole plan	Clarification of plan period and to remove references to 'post plan period'.	Although clarification does not change the plan period in itself the SA should be reviewed to ensure that the plan period is clear.
PM49	Policy SS1	Clarification of Plan period and provision beyond the Plan period to deliver a permanent green belt	The proposed change clarifies the plan period and the provision of additional land to ensure Green Belt permanence to 2038. Although the clarification does not change the plan period or approach to Green Belt in itself, the SA should be reviewed to ensure that the plan period is clear.
PM50 PM53 PM54 PM55	Policy SS1	Clarifies that the minimum housing requirement over the plan period includes 32 dwellings per annum of shortfall and equates to 822 dpa.	The proposed change specifically includes the addition of the identified annualised shortfall (32dpa) within the requirement. This in addition to the 790 dwellings per annum (previously proposed as a modification to 867 dpa requirement in Publication Plan). The figure of 790 dpa was appraised in the Addendum June 2019 (Appendix B) and this should be reviewed.
PM51	Policy SS1	Incorporates Gypsy and Traveller and Showpeople requirements into Policy SS1.	The proposed change integrates reference to the requirement to meet the needs of Gypsies and Travellers and Showpeople. Although the requirements are set out in Policies H5 and H6, and have previously appraised, the SA should be reviewed in light of the additional bullet point.
PM52	Policy SS1	Amended policy wording to clarify the Council's approach to phasing in relation to brownfield land redevelopment and sustainable location of development.	The proposed change regarding prioritising brownfield land introduces additional wording regarding sustainable transport. The SA should be reviewed.
PM58 PM59 PM60 PM61	Policies SS9/ SS10/SS11/SS12	Incorporates wording regarding provision of a site wide recreation and open space strategy to address recreation pressures on Strensall Common Special Area of Conservation (SAC).	The proposed change to the policy strengthens the referencing to open space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure. The SA should be reviewed in light of the changes.
PM62	Policy H1	Proposes deletion of policy wording to clarify the Council's approach, removing reference to phasing sites.	The proposed change includes the removal of criteria relating to the phasing of development. The SA should be reviewed.
PM63	Policy H1	Sets out additional references to those sites which will need to consider the impact on European designated sites within proximity in the context of development proposals brought forward.	The SA should be reviewed to consider the implications of the additional cross reference to Policy GI12 and GI12a. The proposed change sees the deletion of a strategic site (ST35) following the conclusions of the HRA (Feb 2019). The implications for the SA due to the proposed deletion were reviewed in the June 2019 SA Report Addendum and no further SA is required at this stage.
PM63a PM63b	Policy H1	Update to housing trajectory to reflect change to housing requirement in SS1 (PM50)	The SA should be reviewed in light of changes that material to consideration of Policy H1.
PM70 PM71	New Policy GI2a	New policy for that ensures that adverse effects on Strensall Common as a result of	The proposed change introduces a new policy which has not been previously appraised.

Proposed Modification Reference	Plan section	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
		development are avoided and mitigated.	
PM78 PM87 PM100 PM101	Policy SS2/Policies Map	Proposed changes to the inner Green Belt boundary at Heslington, Clifton Park Hospital, Stockton on the Forest and Strensall.	Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed in light of the proposed changes.

Preferred housing growth figure

The proposed change to the housing requirement to 822 dwellings per annum (dpa) sees the annualised shortfall from 2012-2017 (32 dpa) added to the 790 dpa figure previously appraised in the SA Report Addendum (June 2019). The proposed change to explicitly include the shortfall in the requirement reflects consideration at the examination hearing sessions in December 2019 rather than new evidence regarding housing need. The proposed requirement figure has been re-appraised alongside the reasonable alternative figures previously identified (867 dpa, 953 dpa and 1,026 dpa²²).

No change to the findings of the appraisal of the preferred figure has been identified. However, for the Standard Methodology indicative Local Housing Need (LHN) figure (1,026dpa), the uncertainty of significant positive effects in the long term against SA Objective 1 (housing) (identified in the previous appraisal) has been removed due the confirmation of the application of the Standard Methodology across the whole plan period. The appraisal of the housing figure (and alternatives) is set out in **Appendix B** and summarised in **Section 4.3**.

Spatial Strategy policies

The proposed changes to *Policy SS1: Delivering Sustainable Growth for York* include updating the housing requirement, providing additional criterion regarding Gypsy and Traveller and Showpeople housing needs requirements, and revising policy wording on prioritising previously developed land and support for development in sustainable locations. No changes to the appraisal scoring have been identified in light of the proposed policy wording amendments. However, the appraisal commentary has been revised.

The proposed changes to policies SS9, SS10, SS11 and SS12 reflect the findings of the HRA (2020) that addition of policy wording regarding the provision of recreation and open space strategies for the associated strategic sites would ensure no adverse effects on the integrity of Strensall Common SAC. No changes have been identified for the appraisal of SS9, SS10, SS11 and SS12 and the original SA Report (Feb 2018) assessment of 'minor positive effects' against SA Objective 8 (biodiversity) for this policy remains. However, the appraisal commentary has been updated to reflect the HRA (October 2020).

The proposed changes would see the removal of substantial areas of established, built development from within the inner Green Belt boundary at Heslington, Clifton Park Hospital, Stockton on the Forest and Strensall. The removal of these areas from the Green Belt is considered to be in keeping with the overall policy approach of *Policy SS2: The role of York's Green Belt* as established built development in these locations would not appear to add to the openness or permanence of the Green Belt. It is considered that other policies in the plan would ensure that only appropriate development proposals would come forward in

²² The figure of 1,026 dpa is based on the indicative Local Housing Need (LHN) figure identified in government in December 2020 based on the finalised Standard Methodology for calculating housing need. The appraisal in the SA Report Addendum (June 2019) was previously based on the government's Standard Methodology consultation figure of 1,070 identified. The appraisal has been updated to reflect the latest finalised Standard Methodology indicative LHN.

the areas. In the case of Strensall, additional policy would also be in place with regards to potential effects on Strensall Common SAC due to proposed Policy GI2a. Overall, no changes to the SA Report (2018) have been identified due to these PMs.

The appraisal of the Spatial Strategy policies is set out in **Appendix D** and summarised in **Section 4.4**.

Strategic sites

The appraisal for ST7, ST8, ST9 and ST14, has been updated to reflect the findings of the HRA (2020). Sites ST7, ST8, ST9, ST14 are within 5.5km distance of Strensall Common SAC and are therefore identified in the HRA (2020) as requiring mitigation to avoid adverse effects on the integrity of the SAC as a result of recreational pressure. The site appraisal scoring recognises the effects of the site itself (without policy provisions). Significant negative effects are therefore identified for ST7, ST8, ST9 and ST14 for biodiversity (SA Objective 8) predominantly for their potential to have likely significant effects (LSE) on Strensall Common SAC. Following Appropriate Assessment, the effects on Strensall Common SAC considered under biodiversity (SA Objective 8) can be mitigated for these sites through implementation of mitigation in policies within the Local Plan Publication Draft (as proposed to be modified). Due to the distance from Strensall Common SAC (with some sites nearly 5km away) there is some uncertainty as to the effect, due to the potential for recreational activity to be taken closer to the specific development site. Minor positive effects are also found for ST7, in line with the original appraisal.

The HRA (2020) has reconfirmed the findings of the HRA (Feb 2019) in relation to sites ST13, ST33 and ST35 (which is proposed to be removed from the plan). The appraisal commentary for ST15, ST33 and ST35 has been updated to reflect the HRA (2020) findings but no changes to the scoring are identified.

The appraisal of the Strategic Sites is set out in **Appendix C** and summarised in **Section 4.4**.

Thematic policies

The PMs include changes to the policies in the Housing and Green Infrastructure sections of the Publication Draft Local Plan that were considered significant for the purposes of SA. The proposed changes to *Policy H1: Housing Allocations* include the recognition of the proposed change to the housing figure in SS1 linked to the addition of the annualised shortfall (32 dpa) to the housing requirement, removal of text regarding phasing of sites, and additional cross references to policies setting out mitigation for impacts on designated conservation sites. No additional changes to the scoring reported in the SA Report Addendum (June 2019) have been identified. However, a number of changes to the commentary have been identified, particularly in relation to the findings of the HRA (2020) under SA Objective 8 (biodiversity).

The proposed modifications include the addition of a new policy (*Policy GI2a: Strensall Common Special Area of Conservation (SAC)*) which has been appraised (see **Appendix E**). The proposed changes reflect the evidence in the HRA (2020) regarding the potential recreation pressures on Strensall Common SAC and will not allow a net increase in residential development within 400m of Strensall Common and additional mitigation (where required) for proposals for development within 5.5km. Significant positive effects were assessed against health (SA Objective 2), access for all (SA Objective 5), biodiversity (SA Objective 8) and land uses (SA Objective 9). However, negative effects were assessed with regards to the effect on housing (SA Objective 1) and a mix of minor positive and negative effects on the economy (SA Objective 4) due to the potential impacts on housing windfall delivery. However, the presence and extent of any negative effect is uncertain. This has also led to a change in the cumulative score for all policies in the section to a mix of minor positive and minor negative effects with some uncertainty for these SA objectives.

The appraisal of the thematic policies is set out in **Appendix E** and summarised in **Section 4.5**.

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 addition of mixed minor negative effects on housing (SA Objective 1) and the economy (SA Objective 4) for the Green Infrastructure section due to the proposed new policy GI2a. No changes to the overall appraisal of other sections of the draft Local Plan against the SA Objectives have been identified. See **Section 4.6**.

Next steps

This May 2021 addendum to the SA Report (Feb 2018) is a supporting document to the City of York Local Plan Publication Draft – Proposed Modifications Consultation (May 2021). 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 for 6 weeks from **25th May** to midnight on **7th July 2021**.

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

Alternative format response forms are also available from the website or by contacting the Forward Planning Team directly via localplan@york.gov.uk or 01904 552255.

Please state clearly which Proposed Modification number (PM) or document your response relates to.

Contents

1.	Introduction	15
1.1	Overview	15
1.2	Local Plan evidence base updates	16
	Green Belt	17
1.3	Background	17
1.4	The proposed modifications	19
1.5	The requirement for Sustainability Appraisal	19
	Sustainability Appraisal of the draft City of York Local Plan	20
1.6	Purpose of this report	21
1.7	Structure of this addendum	21
2.	Sustainability Appraisal approach	22
2.1	Introduction	22
2.2	Determining the significance of the Proposed Modifications for SA	22
	Key principles	22
2.3	SA Framework	23
2.4	Appraisal of policies	25
2.5	Appraisal of Strategic Sites	26
2.6	When was the review undertaken and by whom	29
2.7	Technical difficulties	29
3.	HRA Update	30
3.1	Introduction	30
3.1	HRA Report (October 2020)	30
4.	Summary appraisal of effects	32
4.1	Introduction	32
4.2	Identification of potential significant Proposed Modifications	32
4.3	Housing requirement	33
4.4	Spatial Strategy	34
	Spatial Strategy policies	34
	Strategic Sites	36
4.5	Thematic policies	41
	Housing	41
	Green Infrastructure	41
4.6	Cumulative, synergistic and indirect effects	42

5. Conclusion 48

5.2 Next Steps 48

Table 2.1	SA Framework	23
Table 2.2	Scoring system used in the SA of proposed policies and sites	25
Table 2.3	Site Assessment Criteria	26
Table 3.1	Summary of likely significant effects that cannot be ruled out	30
Table 4.1	Summary of Proposed Modifications to the Publication Draft Local Plan that are considered significant	32
Table 4.2	Summary of Strategic sites assessment	38
Table 4.2	Updated results of the cumulative effects assessment	43

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 Spatial Strategy Policies
Appendix E	Updated Appraisal of Thematic Local Plan Policies

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 permanence of the Green Belt beyond the plan period). 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 Group UK Ltd²³ (Wood), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft and published a SA Report alongside the consultation Local Plan in February 2018²⁴ (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)²⁵ and identified a number of changes to the draft Local Plan²⁶. Wood and the Council prepared a SA Report Addendum (April 2018)²⁷ to appraise the changes related to the HRA (April 2018). The Council then consulted on a number of Proposed Modifications (PMs) prior to hearing sessions taking place as part of the examination. These were consulted on in the City of York Local Plan Publication Draft – Proposed Modifications Consultation (June 2019)²⁸ which was accompanied by a SA Report Addendum (June 2019)²⁹. These changes related to revised evidence on housing need, HRA and Green Belt.
- 1.1.4 The Council is now proposing a number of new modifications to the draft Local Plan linked to updates to the evidence base in terms of updated HRA and the Green Belt and as a result of the first set of examination hearings held in December 2019 (see **Appendix A** for modifications). Some of these PMs amend or supersede the changes appraised in previous SA Report Addenda. Others are newly identified.

²³ Formally Amec Foster Wheeler Environment and Infrastructure UK Ltd and Wood 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.

²⁴ Amec Foster Wheeler and City of York Council (February 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report

²⁵ 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

²⁶ 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

²⁷ Wood and City of York Council (April 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum

²⁸ See details of consultation via: <https://www.york.gov.uk/LocalPlanModificationsConsultation>

²⁹ Wood and City of York Council (June 2019) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum

- 1.1.5 This SA Report Addendum (May 2021) has been prepared to assess the implications for the SA of the PMs. It appraises the likely significant effects of the PMs in order to update the SA Report (Feb 2018), SA Report Addendum (April 2018) and SA Report Addendum (June 2019) (as appropriate) and ensures that all the likely significant effects of the draft Local Plan (as proposed to be modified) have been identified, described and evaluated.

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.

Habitats Regulations Assessment (HRA)

- 1.2.2 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 sites³⁰ 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)³¹.
- 1.2.3 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)³² 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). The Council therefore updated the HRA³³. This included the modelling of air quality impacts of additional traffic movements arising from new growth on ecological sites³⁴ (which was presented as an appendix to the HRA in April 2018).
- 1.2.4 An updated HRA Report was submitted to the examination in February 2019, which superseded evidence in the HRA (April 2018). 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 Special Area of Conservation (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. Section 4 of SA Report Addendum (June

³⁰ 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.

³¹ '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.

³² Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

³³ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Habitats Regulations Assessment of the City of York Council Local Plan

³⁴ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

2019) sets out a summary of the HRA Report (April 2018) and HRA (February 2019)³⁵. This report does not seek to repeat the information presented.

- 1.2.5 An updated HRA Report (October 2020) was submitted to the examination in December 2020. The HRA (October 2020) confirms the findings of the 2019 HRA regarding the removal of Policy SS19 (site ST35) and site H59. In addition, in light of case law,³⁶ Appropriate Assessment was undertaken of policies SS9 (site ST7), SS10 (ST8), SS11 (ST9) and SS12 (ST14). The HRA concluded that adverse effect on the integrity on the Strensall Common SAC with regards to recreational pressure will be avoided if mitigation in the form of modification is included within the Local Plan policies. Natural England has confirmed agreement with the screening findings of the HRA (2020) and welcomed the PMs³⁷.
- 1.2.6 This Report addresses the policy changes made in response to the update of the HRA (Oct 2020). The Report should be read alongside the SA Report (Feb 2018), SA Report Addendum (April 2018) and SA Report Addendum (June 2019). See **Section 3** for further detail about the HRA.

Green Belt

- 1.2.7 The Council submitted a Topic Paper³⁸ to the examination in 2018 which set out the approach to defining the Green Belt across the City. The Council also prepared an Addendum in 2019³⁹ in response to the Inspectors' request for the Council's more detailed justification of the boundaries. As part of the further work undertaken to produce the Addendum, and as a result of the proposed modifications required by the HRA (Feb 2019), the Council proposed a number of modifications to the Green Belt boundary identified in the 2018 Local Plan Publication Draft. These changes were consulted on the first City of York Local Plan Publication Draft – Proposed Modifications Consultation (2019) and screened in the accompanying June 2019 SA Report Addendum. The proposed changes were discussed at the first set of examination hearings in December 2019.
- 1.2.8 The Inspectors' letter of June 2020⁴⁰ supported the Council's approach to Green Belt insofar as determining the general extent of Green Belt and the primary purpose to preserve the setting and special character of York. However, the Council have now produced an updated Green Belt Topic Paper Addendum (2021) to address concerns raised by the Inspectors in relation to the methodology. Whilst the level of proposed change as a result of this clarified Addendum is not considered significant, a number of changes to the boundaries have been proposed. This report addresses the proposed amendments. **Appendix A** sets out consideration of the proposed changes.

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

³⁵ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

³⁶ People Over Wind and Sweetman v Coillte Teoranta (C 323/17) [2018] PTSR 1668

³⁷ See Appendix J of the Habitats Regulations Assessment of the City of York Council Local Plan (letter dated 8th October 2020 from Natural England to City of York Council). Available via: <https://www.york.gov.uk/downloads/file/6297/ex-cyc-45a-hra-2020-appendices> [Accessed April 2021]

³⁸ City of York Council (2018) Topic Paper 1: Approach to York's Green Belt

³⁹ City of York Council (2019) Topic Paper 1: Approach to York's Green Belt Addendum

⁴⁰ See: <https://www.york.gov.uk/downloads/file/5795/ex-ins-15-letter-to-lpa-12-june-2020> [Accessed May 2021]

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 2013⁴¹. 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 (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 is being examined against the

⁴¹ 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).

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 proposed a number of modifications to the draft Local Plan linked to updated housing needs, HRA and Green Belt evidence base. These PMs were referenced PM1 to PM46. In some cases, these PMs were the same as, or superseded, the proposed changes to the draft Local Plan that were appraised in the SA Report Addendum (April 2018). These PMs and SA Report Addendum were consulted on in June and July 2019.
- 1.3.9 The Council is now consulting on a second set of PMs referenced as PM47 to PM102. This SA Report Addendum (May 2021) has been prepared to assess the implications for the SA of these PMs. It appraises the likely significant effects of the PMs to ensure that all the likely significant effects of the draft Local Plan (as proposed to be modified) have been identified, described and evaluated.

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.
- Clarification of the plan period.
 - Proposed changes to policies SS1 and H1 to amend the housing requirement to 822 dwellings per annum (dpa) with associated changes to the explanatory text.
 - The inclusion of policy wording in relation to Gypsy and Traveller and Showpeople need, prioritising previously developed land and directing development to sustainable locations within Policy SS1.
 - The inclusion of policy wording in SS9, SS10, SS1, SS12 related to the requirement for site wide recreation and open space strategies to support delivery of strategic sites linked to HRA (2020) evidence.
 - Revised policy wording within Policy H5 related to the onsite delivery of pitches to meet Gypsy and Traveller need.
 - The provision of a new policy *GI2a: Strensall Common Special Area of Conservation (SAC)* linked to the conclusions of the HRA (2020).
 - Additional cross references to Policies GI2 and GI2a within Policies SS9, SS10, SS1, SS12, H1 related to open space provision.
 - Changes to the inner Green Belt boundaries.

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

- 1.5.2 The SEA 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.
- 1.5.3 At paragraphs 150 and 151, the National Planning Policy Framework (NPPF) (2012)⁴² 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 development⁴³. In this context, paragraph 165 of the NPPF⁴⁴ reiterates the requirement for SA/SEA as it relates to local plan preparation:
- "A sustainability appraisal which meets the requirements 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 037⁴⁵) 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.
- 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)⁴⁶;
 - 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). In addition, following submission, a SA Report Addendum to the Local Plan Publication Draft SA Report was published in June 2019.

⁴² 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 April 2021]. 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.

⁴³ 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).

⁴⁴ The requirement for SA/SEA for local plan preparation is set out at paragraph 32 of the NPPF (2019).

⁴⁵ Planning Practice Guidance, Reference ID 61-037-20190315 (Revision date: 15/03/2019)

⁴⁶ 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.

- 1.5.7 The SA Report accompanying the Local Plan Publication Draft was prepared to meet the reporting requirements of the SEA Regulation 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 May 2021 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 PMs to the draft Local Plan consulted on in May 2021 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 (May 2021).
- 1.6.2 This report should be read in conjunction with the following documents which can be accessed through the Council's examination website (<https://www.york.gov.uk/LocalPlanExamination>):
- City of York Local Plan: Publication Draft - Sustainability Appraisal Report (February 2018),
 - City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (April 2018)
 - City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (June 2019)
- 1.6.3 The purpose of this report is to ensure that where relevant, the SA Report (Feb 2018) and the SA Report Addenda (April 2018 and June 2019) have been updated to reflect the outcomes related to the examination hearings to date, the latest HRA (Oct 2020) 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 regulations).

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 HRA to date;
 - Section 4 sets out the appraisal of effects; and
 - Section 5 concludes the report.

2. Sustainability Appraisal approach

2.1 Introduction

- 2.1.1 This section describes the approach to the SA, including how any proposed 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 (PMs) 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 PM to a policy introduces or removes criteria, a judgement was made as to whether or not the PM 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 PMs 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 PMs involve the introduction of a new policy, this is treated as significant.
- 2.2.5 PMs to supporting text clarify how policies will be implemented and/or provide justification for them. Such PMs have not been considered to be significant, except where they give effect to changes identified for the housing requirement.
- 2.2.6 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 previous SA Report Addenda (April 2018 or June 2019) 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 4**. See **Appendix B to E** 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 Regulation 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 Regulation Topic
1. To meet the diverse housing needs of the population in a sustainable way.	<ul style="list-style-type: none"> Deliver homes to meet the needs of the population in terms of quantity, quality Promote improvements to the existing and future housing stock Locate sites in areas of known housing need Deliver community facilities for the needs of the population Deliver pitches required for Gypsies and Travellers and Showpeople 	Population
2. Improve the health and wellbeing of York's population	<ul style="list-style-type: none"> Avoid locating development where environmental circumstances could negatively impact on people's health Improve access to open space / multi-functional open space Promotes a healthier lifestyle through access to leisure opportunities (walking /cycling) Improves access to healthcare Provides or promotes safety and security for residents Ensure that land contamination/pollution does not pose unacceptable risks to health 	Population, Human Health
3. Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> Provide good education and training opportunities for all Support existing higher and further educational establishments for continued success Provide good quality employment opportunities available to all 	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	<ul style="list-style-type: none"> Help deliver conditions for business success and investment Deliver a flexible and relevant workforce for the future Deliver and promote stable economic growth 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 	Population, Human Health

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

SA Objective	Guide questions. Will the policy/proposal ...	SEA Regulation Topic
	<ul style="list-style-type: none"> • Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper 	
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.
+	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 D and E** 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. Any new amendments to previously presented updated appraisals are in **bold**.

2.4.3 The appraisal of the housing figure and reasonable alternatives (**Appendix B**) has updated the appraisal matrix included in the SA Report Addendum (June 2019) Appendix B and is also presented with underline/strikethrough.

2.5 Appraisal of Strategic 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.
- 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 **Appendix C** sets out the update of the appraisal of strategic sites. 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 ~~strike through~~ for deleted text. Where the text is not underlined or struck through it is the original text taken from the SA Report (Feb 2018) appendix and has not been changed. No additional local sites have been appraised in this Addendum.
- 2.5.5 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 ⁴⁷	
		Per indicator	Total	Points scored	SA Symbol
1: To meet the diverse housing needs of the population in a sustainable way.	No. of dwellings proposed/estimated	n/a	n/a	100+ 1-99 0	++ + 0
2: Improve the health and well-being of York's population	Access to: • doctors • open space	5 5	10	6-10 3-5 1-2 0	++ + - --
3: Improve education, skills development and training for an effective workforce	(Housing) Access to: • nursery provision • primary schools • secondary schools • higher education facilities	5 5 5 5	20	11 -20 5-10 1-4 0 4-5	++ + - -- ++

⁴⁷ Where mixed scores against SA Objectives have been assessed (for example a mix of positive and negative scores), the appraisal scoring above includes both scores. For strategic sites further commentary is provided for the reasoning in the completed site matrices.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring ⁴⁷	
		Per indicator	Total	Points scored	SA Symbol
	(Employment) Access to: <ul style="list-style-type: none"> nursery provision 	5	5	1-2 0	+ -
4: Create jobs and deliver growth of a sustainable and inclusive economy	No. of jobs potentially created	n/a	n/a	100+ 1-99 0	++ + 0
5: Help deliver equality and access to all	Access to: <ul style="list-style-type: none"> Non-frequent bus routes Frequent bus routes Park and ride bus stops Railway station by walking Railway station by cycling Adopted highways Cycle routes 	3 5 5 5 5 5	33 ⁴⁸	Employment score: 18-33 9- 17 1-8 0	++ + I --
6: Reduce the need to travel and deliver a sustainable integrated transport network	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 ⁴⁹	<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 ⁵⁰ 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 	n/a	n/a	Brownfield	++ + / -

⁴⁸ 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.

⁴⁹ In reference to these criteria, 'adjacent' refers to a 10m buffer from a non-statutory site.

⁵⁰ 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 ⁴⁷	
	Indicator	Per indicator	Total	Points scored	SA Symbol
	<ul style="list-style-type: none"> Agricultural Land Classification 			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 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 ⁵¹	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 ⁵²	n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0

⁵¹ 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.

⁵² 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.

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 April/May 2021 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 Regulations require the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. No technical difficulties were encountered during the preparation of this Report. The uncertainties and assumptions set out in Section 5.9 of the SA Report (Feb 2018) remain relevant.

3. HRA Update

3.1 Introduction

- 3.1.1 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.
- 3.1.2 At the time of publication of the Local Plan Publication Draft (Feb 2018), the HRA updated screening⁵³ 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 HRA⁵⁴. This included the modelling of air quality impacts of additional traffic movements arising from new growth on ecological sites⁵⁵ (which was presented as an appendix to the HRA in April 2018).
- 3.1.3 An updated HRA Report was submitted to the examination in February 2019, which superseded evidence in the HRA (April 2018). Section 4 of SA Report Addendum (June 2019) set out a summary of the HRA Report (April 2018) and HRA (February 2019)⁵⁶. This report does not seek to repeat the information previously presented.
- 3.1.4 An updated HRA Report (October 2020) was also submitted to the examination in December 2020. The outcomes are summarised below.

3.1 HRA Report (October 2020)

- 3.1.1 The HRA Report (2020)⁵⁷ updates the findings of previous HRA reports. The includes greater scrutiny of relevant policies and, at the request of the examination Inspectors, also comprises changes to confirm compliance with case law.
- 3.1.2 The HRA (2020) screens the Local Plan and identifies that it is not possible to screen out a number of policies/site allocations from having potential significant effects. **Table 3.1** sets out a summary of the screening findings.

Table 3.1 Summary of likely significant effects that cannot be ruled out

European site	Potential effect	Policies
Strensall Common	Recreational pressure and urban-edge effects	SS19/ST35, E18 & H59(A)
	Recreational pressure	SS9/ST7, SS10/ST8, SS11/ST9, SS12/ST14, SS15/ST17, SS17/ST32, H1a(A), H1b(A), H3(A), H7(A), H22(A), H23(A), H31(A), H46(A), H55(A), H56(A), H58(A), SH1

⁵³ Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

⁵⁴ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Habitats Regulations Assessment of the City of York Council Local Plan

⁵⁵ Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

⁵⁶ Waterman Infrastructure & Environment Limited for City of York Council (February 2019) Habitats Regulations Assessment of the City of York Council Local Plan

⁵⁷ Available via: <https://www.york.gov.uk/downloads/file/6296/ex-cyc-45-hra-2020>

European site	Potential effect	Policies
	Windfall development	H1(P)
	Air pollution	SS19/ST35, E18 & H59(A)
	Wetland features	SS19/ST35, H59(A), E18
Lower Derwent Valley	Mobile species	SS13/ST15
	Recreational pressure	SS13/ST15 & SS18/ST33
River Derwent	Air pollution	SS13/ST15

- 3.1.3 The HRA (2020) therefore included an Appropriate Assessment.
- 3.1.4 The appropriate assessment found that the addition of mitigation measures to E18, SS9/ST7, SS10/ST8, SS11/ST9 and SS12/ST14 would be sufficient to remove the threat of an adverse effect on the integrity of the site from these policies. In terms of SS15/ST17 & SS17/ST32, and H1a(A), H1b(A), H3(A), H7(A), H22(A), H23(A), H31(A), H46(A), H55(A), H56(A), H58(A) and SH1, adverse effects could be ruled out without the need for mitigation.
- 3.1.5 The HRA (2020) reconfirms the conclusion of the HRA (2019) that SS19/ST35 and H59(A) have to be removed from Local Plan as adverse effects from recreational pressures and urban-edge effects on the integrity of Strensall Common SAC cannot be avoided. These proposed changes were appraised in the SA Report Addendum (June 2019).
- 3.1.6 Natural England has been consulted on the HRA (2020) as part of the iterative approach. In a letter dated 8th October 2020⁵⁸, Natural England confirmed agreement with the screening findings of the HRA (2020) and welcomed the PMs, in particular, the proposed introduction of Policy GI2a. They also confirmed that they are satisfied that the HRA (2020) is in line with the People over Wind and Sweetman vs Coillte Teoranta judgment⁵⁹.

⁵⁸ See Appendix J of the Habitats Regulations Assessment of the City of York Council Local Plan (letter dated 8th October 2020 from Natural England to City of York Council). Available via: <https://www.york.gov.uk/downloads/file/6297/ex-cyc-45a-hra-2020-appendices> [Accessed April 2021]

⁵⁹ People Over Wind and Sweetman v Coillte Teoranta (C 323/17) [2018] PTSR 1668

4. Summary appraisal of effects

4.1 Introduction

- 4.1.1 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, strategic and thematic policies, and the Local Plan cumulatively (**Appendices B to G**).
- 4.1.2 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.
- 4.1.3 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 4.3 to 4.6** and set out in **Appendices B to E**. Where appropriate, new text is underlined, and deleted text is indicated by ~~striketrough~~. Where further changes are proposed to the text updated previously updated by the SA Report Addendum (June 2019) these are also highlighted in **bold**. 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.

4.2 Identification of potential significant Proposed Modifications

- 4.2.1 **Table 4.1** 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 Addenda (April 2018 and June 2019).

Table 4.1 Summary of Proposed Modifications to the Publication Draft Local Plan that are considered significant

Proposed Modification Reference	Plan section	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
PM47 PM48	Whole plan	Clarification of plan period and to remove references to 'post plan period'.	Although clarification does not change the plan period in itself the SA should be reviewed to ensure that the plan period is clear.
PM49	Policy SS1	Clarification of Plan period and provision beyond the Plan period to deliver a permanent green belt	The proposed change clarifies the plan period and the provision of additional land to ensure Green Belt permanence to 2038. Although the clarification does not change the plan period or approach to Green Belt in itself, the SA should be reviewed to ensure that the plan period is clear.
PM50 PM53 PM54 PM55	Policy SS1	Clarifies that the minimum housing requirement over the plan period includes 32 dwellings per annum of shortfall and equates to 822 dpa.	The proposed change specifically includes the addition of the identified annualised shortfall (32dpa) within the requirement. This in addition to the 790 dwellings per annum (previously proposed as a modification to 867 dpa requirement in Publication Plan). The figure of 790 dpa was

Proposed Modification Reference	Plan section	Summary of proposed modification	Why this Proposed Modification is considered significant for the SA
			appraised in the Addendum June 2019 (Appendix B) and this should be reviewed.
PM51	Policy SS1	Incorporates Gypsy and Traveller and Showpeople requirements into Policy SS1.	The proposed change integrates reference to the requirement to meet the needs of Gypsies and Travellers and Showpeople. Although the requirements are set out in Policies H5 and H6, and have previously appraised, the SA should be reviewed in light of the additional bullet point.
PM52	Policy SS1	Amended policy wording to clarify the Council's approach to phasing in relation to brownfield land redevelopment and sustainable location of development.	The proposed change regarding prioritising brownfield land introduces additional wording regarding sustainable transport. The SA should be reviewed.
PM58 PM59 PM60 PM61	Policies SS9/ SS10/SS11/SS12	Incorporates wording regarding provision of a site wide recreation and open space strategy to address recreation pressures on Strensall Common Special Area of Conservation (SAC).	The proposed change to the policy strengthens the referencing to open space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure. The SA should be reviewed in light of the changes.
PM62	Policy H1	Proposes deletion of policy wording to clarify the Council's approach, removing reference to phasing sites.	The proposed change includes the removal of criteria relating to the phasing of development. The SA should be reviewed.
PM63	Policy H1	Sets out additional references to those sites which will need to consider the impact on European designated sites within proximity in the context of development proposals brought forward.	The SA should be reviewed to consider the implications of the additional cross reference to Policy GI12 and GI12a. The proposed change sees the deletion of a strategic site (ST35) following the conclusions of the HRA (Feb 2019). The implications for the SA due to the proposed deletion were reviewed in the June 2019 SA Report Addendum and no further SA is required at this stage.
PM63a PM63b	Policy H1	Update to housing trajectory to reflect change to housing requirement in SS1 (PM50)	The SA should be reviewed in light of changes that material to consideration of Policy H1.
PM70 PM71	New Policy GI2a	New policy for that ensures that adverse effects on Strensall Common as a result of development are avoided and mitigated.	The proposed change introduces a new policy which has not been previously appraised.
PM78 PM87 PM100 PM101	Policy SS2/Policies Map	Proposed changes to the inner Green Belt boundary at Heslington, Clifton Park Hospital, Stockton on the Forest and Strensall.	Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed in light of the proposed changes.

4.3 Housing requirement

- 4.3.1 The proposed change to the housing requirement in Policy SS1 sets out a minimum housing requirement of 822 dwellings per annum (dpa) in the plan period (2017-2032/33). The requirement reflects the housing need figure of 790 dpa proposed in the previous modifications (and which was

subject to SA in the June 2019 SA Report Addendum) with the addition of annualised shortfall of 32 dpa.

- 4.3.2 Section 5.3 and Appendix B of the SA Report Addendum (June 2019) set out an appraisal of the proposed housing requirement (then 790dpa) and three alternatives: the Publication Draft Figure (867dpa); Reasonable Alternative figure in 2017 SHMA (953dpa); and Government's indicative 2017 consultation housing need figure (1,070dpa).
- 4.3.3 The proposed revised housing requirement (822dpa) which now explicitly includes the annualised shortfall, has been re-appraised against the SA objectives. This figure does not reflect new evidence but rather recognises that the housing requirement proposed in the Plan has been amended to explicitly include the annualised shortfall of housing in previous years.
- 4.3.4 The Government has confirmed the Standard Methodology since the publication of the June 2019 SA Report Addendum. Therefore, the appraisal has taken into account and appraised the indicative Local Housing Need (LHN) figure for City of York identified by the government when confirming the standard methodology in December 2020 (1,026dpa).
- 4.3.5 The full findings of the appraisal are presented in **Appendix B**.
- 4.3.6 The appraisal of the proposed figure (822dpa) identifies the same effects as the figure of 790dpa appraised in the June 2019 SA Report Addendum. No changes to commentary in Section 5.3 of the Addendum (with the exception of references to 822dpa rather than 790dpa) have been identified. The summary of the alternatives remains unchanged with the exception of para 5.3.20. The Standard Methodology approach has been confirmed and it is clear that the indicative LHN figure can be extended to cover the full plan period and therefore covers beyond the period of 2016-2026 covered in the consultation figure.
- 4.3.7 For the Standard Methodology indicative LHN figure alternative (1,026dpa), the uncertainty of significant positive effects in the long term against SA Objective 1 (housing) (identified in the previous appraisal) has been removed due the confirmation of the application of the Standard Methodology across the whole plan period. Therefore, significant positive effects (rather than a mix of significant positive and mixed effects) against SA Objective 1 have been identified in the long term in recognition of the substantial boost to housing that could be expected from delivery against a requirement of 1,026dpa.

4.4 Spatial Strategy

Spatial Strategy policies

- 4.4.1 The proposed changes to the Spatial Strategy policies are set out in **Table 5.1** and **Appendix A**. The Spatial Strategy policies have been re-appraised. Section 6.5 and Appendix F of the SA Report (Feb 2018) reported on the appraisal of the effects of the spatial strategy polices against the SA Framework. The appraisal was updated in the subsequent SA addenda.
- 4.4.2 The proposed changes to *Policy SS1: Delivery Sustainable Growth for York* reflect the inclusion of the proposed preferred housing figure of 822dpa, which is the objectively assessed need figure of 790dpa (identified in the GL Hearn 2019 Housing Needs Assessment Update), plus 32dpa to account for the shortfall in provision between 2012 and 2017 annualised over the plan period (2017-2032/33). Section 5.4 of SA Report Addendum (June 2019) reported on the appraisal of Policy SS1 with regards to the provision of 790dpa. No addition changes to the scoring for the policy against the SA objectives has been identified in addition to those reported in the SA Report Addendum (June 2019).

- 4.4.3 Additionally, PMs included updating the housing requirement, providing additional criterion regarding Gypsy and Traveller and Showpeople housing needs requirements, and revising policy wording on prioritising previously developed land and support for development in sustainable locations. No changes the appraisal scoring have been identified in light of the proposed policy wording changes and the proposed changes reconfirm the positive effects on SA found for SA Objective 1(housing) and mix of positive and negative effects on SA Objectives 6 (reducing the need to travel) and 9 (efficient use of land resources) previously appraised. However, the appraisal commentary has been revised.
- 4.4.4 To reflect the updated appraisal, and the proposed clarification of the plan period, paragraphs 6.5.7 of the SA Report (Feb 2018) (and 5.4.8 of the SA Report Addendum (June 2019)) 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 ~~790,867-822~~ new dwellings per annum over the plan period (equivalent to ~~12,640~~ ~~13,872~~ **13,152** 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. **The requirement would also help to address historic shortfall in delivery.** ~~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).~~*
- 4.4.5 The proposed changes to policies SS9, SS10, SS11 and SS12 reflect the finding of the HRA (2020) that the addition of policy wording regarding the provision of recreation and open space strategies for the associated strategic sites would ensure no adverse effects on the integrity of Strensall Common SAC. No changes have been identified for the appraisal of SS9, SS10, SS11 and SS12 and the original SA Report (Feb 2018) assessment of 'minor positive effects' against SA Objective 8 (biodiversity) for this policy remains. However, the appraisal commentary has been updated to reflect the HRA (October 2020).
- 4.4.6 To reflect the updated appraisal (and its associated effects on biodiversity (SA Objective 8) paragraph 6.5.14 of the SA Report (Feb 2018) (and 5.4.8 of the SA Report Addendum (June 2019)) 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 and Oct 2020~~) 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 ~~and Oct 2020~~)) 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. **The HRA (Oct 2020), following further consideration of recreational pressure evidence, and Appropriate Assessment, concluded that the inclusion of policy wording regarding recreation and open space strategies in policies SS9, SS10, SS11 and SS12 would ensure no adverse effects with regards to recreational pressure on Strensall Common SAC. Therefore Overall, a mix of positive and negative effects with uncertainty has been assessed for the policies overall.***

- 4.4.7 The PMs in **Table 4.1** include proposed changes to the inner Green Belt boundary at Heslington, Clifton Park Hospital, Stockton on the Forest and Strensall, which have been identified in light of updated Green Belt Topic Paper evidence. *Policy SS2: The role of York's Green Belt* sets out that the policy approach to Green Belt is to safeguard the setting and special character of York and have defined, detailed boundaries following recognisable physical features. This policy has been reviewed in light of the proposed changes.
- 4.4.8 The proposed changes would see the removal of substantial areas of established, built development from the Green Belt in these locations. The removal of these areas from the Green Belt is considered to be in keeping with the overall policy approach of SS2 as established built development would not appear to add to the openness or permanence of the Green Belt in these locations. It is considered that other policies in the plan would ensure that only appropriate development proposals would come forward in these areas. In the case of Strensall, additional policy would also be in place with regards to potential effects on Strensall Common SAC due to proposed Policy GI2a. Overall, no changes to the SA Report (2018) have been identified due to these PMs.

Strategic Sites

- 4.4.9 The HRA (2020) determined that likely significant effects on Strensall Common SAC as a result of an increase in recreational pressure from the strategic sites within 5.5km of the SAC (sites ST7, ST8, ST9 and ST14) could not be ruled out. The Appropriate Assessment found that mitigation in the form of revised policy wording was required to avoid adverse effects on the integrity of the SAC.
- 4.4.10 The strategic sites appraisal for ST7, ST8, ST9 and ST14, has therefore been updated to reflect the findings of the HRA (2020). The site appraisal scoring recognises the effects of the site itself (without policy provisions). Significant negative effects are therefore identified for ST7, ST8, ST9 and ST14 for biodiversity (SA Objective 8) predominantly for their potential to have likely significant effects (LSE) on Strensall Common SAC. Following Appropriate Assessment, the effects on European sites considered under biodiversity (SA Objective 8) can be mitigated for these sites through the implementation of mitigation in policies within the Local Plan Publication Draft (as proposed to be modified). Due to the distance from Strensall Common SAC (with some sites nearly 5km away) some uncertainty as to the effect has also been identified, due to the potential for recreational activity to be taken closer to the site. For site ST7, minor positive effects have also been assessed, as per the original appraisal of the site, due to the potential to improve the porosity of the urban area to wildlife.

- 4.4.11 The HRA (2020) has reconfirmed the findings of the HRA (Feb 2019) in relation to sites ST13, ST33 and ST35 (which is proposed to be removed from the plan). The appraisal commentary for ST15, ST33 and ST35 has been updated to reflect the HRA (2020) findings but no changes to the scoring are identified (see **Appendix C**).
- 4.4.12 No further changes to the appraisal of other strategic sites have therefore been identified. **Table 4.2** updates the summary of site allocations and updates **Table 6.2** of the SA Report (Feb 2018).
- 4.4.13 To reflect the propose changes, paragraph 6.5.31 of the SA Report (Feb 2018) (and 5.5.7 of the SA Report Addendum (June 2019)) 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** ~~eight~~ strategic sites. Two of these sites have local designations within 50m whilst **for the remaining three sites (ST15, and ST33 and ST35) the appraisal** aligns with the outcomes of the HRA Screening Report (20**19**720), 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. The HRA (2020) found that adverse effects on the integrity of Strensall Common SAC due to recreational pressures could not be screened out for ST7, ST8, ST9 and ST14, but adverse effects would be avoided with mitigation in policy wording following Appropriate Assessment. Therefore, significant negative effects have been found with but some uncertainty due the distance between the sites and Strensall Common. For ST7, minor positive effects were also assessed. 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.”*

Table 4.2 Summary of Strategic sites assessment

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	-
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	?	-	--	--

Site ref	Allocation reference	Objective	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility	SAO6: Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape			
		Site Name																		
951	ST36	Imphal Barracks, Fulford Road	++	+	-	+	?	+	-	+	-	-	-	-	-	?	?	-	?	-
246	ST37	Whitehall Grange	0	0	-	+	++	0	-	-	-	-	-	-	0	-	-	-	-	

4.5 Thematic policies

- 4.5.1 The proposed changes to the thematic policies are summarised in **Table 4.1** 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). Section 5.5 and Appendix G of the SA Report Addendum (June 2019) reported on the appraisal of proposed changes following the revised housing need evidence (Jan 2019) and update of the HRA (Feb 2019) and Appropriate Assessment. This section summarises the outcomes of the review of appraisal following the proposed changes to the draft Local Plan. See **Appendix A** and **Appendix E**.

Housing

- 4.5.2 The proposed modifications to the housing policies are summarised in **Table 4.1** above. An updated appraisal is contained in **Appendix E**. The proposed changes to Policy H1: Housing Allocations include the recognition of the proposed change to the housing figure in SS1 linked to the addition of the annualised shortfall (32 dpa) to the housing requirement, removal of text regarding phasing of sites, and additional reference cross references to policies setting out mitigation for impacts on designated conservation sites.
- 4.5.3 No additional changes to the scoring reported in the SA Report Addendum (June 2019) have been identified. However, a number of changes to the commentary have been identified, particularly in relation to the findings of the HRA (2020) under SA Objective 8 (biodiversity).
- 4.5.4 To reflect the updated appraisal, paragraph 6.6.15 of the SA Report (Feb 2018) (and 5.5.7 of the SA Report Addendum (June 2019)) 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 ~~86790-822~~ new dwellings over the plan period up to 2032/33. This equates to a requirement for ~~12,640~~ ~~13,872~~ **13,152** 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."*

Green Infrastructure

- 4.5.5 The proposed modifications include the addition of a new policy within the Green Infrastructure section of the Publication Draft Local Plan. Proposed *Policy GI2a: Strensall Common Special Area of Conservation (SAC)* has been appraised (see **Appendix E**). The proposed changes reflect the

evidence in the HRA (2020) regarding the potential recreation pressures on Strensall Common SAC and will not allow a net increase in residential development within 400m of Strensall Common and requires additional mitigation (where required) for proposals for development within 5.5km.

4.5.6 Significant positive effects were assessed against health (SA Objective 2), access for all (SA Objective 5), biodiversity (SA Objective 8) and land use (SA Objective 9). However, negative effects were assessed with regards to the effect on housing (SA Objective 1) and a mix of minor positive and negative effects on the economy (SA Objective 4) due to the potential expected impacts on delivery of housing in the area. However, this is likely to be very minor and uncertain to some extent as it would affect windfall development only. This has also led to a change in the cumulative score for all policies in the section to a mix of minor positive and minor negative effects, with uncertainty, for these objectives.

4.5.7 Changes are also proposed to the text of the Publication Plan SA Report (Feb 2018) paragraph 6.6.42 and 6.6.43 as follows:

"The implementation of Policies GI1-7 will facilitate the creation of an attractive setting for new houses and access to natural environments and recreational activities for all residents. The establishment of a Green Infrastructure Network across the City could provide a range of opportunities for the training and tourism opportunities. Cumulative minor positive effects have been identified against SA Objectives 1 (Housing), 3 (Education) and 4 (Employment). However, minor negative effects have been identified for SA Objective 1 (housing) reflecting that GI2a would restrict net new residential development within the 400m zone of influence, and potentially impact on development in the broader 5.5km zone, which would have a minor negative on new housing in the area. This effect would be very minor and is uncertain to some extent as it would affect windfall development only. A mix of minor positive and minor negative effects have been identified for SA Objective 4 (employment) as associated economic benefits would also be limited in this area.

No ~~minor or~~ significant negative effects were identified during the appraisal of the Green Infrastructure Policies."

4.5.8 No proposed changes to other policy sections of the draft Local Plan were considered significant for the purposes of SA and, as such, no further changes are required to this section of the SA Report (Feb 2018).

4.6 Cumulative, synergistic and indirect effects

4.6.1 Section 6.7 of the SA Report (Feb 2018) outlined the total effects of the plan policies. The effects were re-appraised in the SA Report Addenda (April 2018 and June 2019) following a number of changes proposed at that stage linked to the housing evidence and HRA. Following the re-appraisal set out above, the cumulative effects table presented in Table 5.4 of the SA Report Addendum (June 2019) has been reviewed and updated (see **Table 4.2**).

4.6.2 The changes identified in the cumulative scoring are linked to the appraisal of Policy GI2a. The changes reflect the finding of negative effects on housing (SA Objective 1) and mix of positive and negative on economy (SA Objective 4) in the overall score for the policy section, with some uncertainty. No changes to the overall appraisal of other sections of the draft Local Plan against the SA Objectives have been identified.

Table 4.3 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 Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
1. Housing	++	++/-	+	++/-	++	++	+	+/-/?	0	+	+	0	0	+	++/-	It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective.
2. Health	++	++	+	++	++	++	+	++	+	+	++	+	++	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. Care must be taken to ensure delivery of facilities in the most appropriate places and the accessibility of urban extensions.
3. Education	+	++	+	0	0	++	0	+	0	0	0	0	+	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
4. Economy	+	++	++	+	0	++	0	+/-/?	0	++	0	+	+	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
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 and

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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 reuse of previously developed

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	(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 Belt	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.

5. Conclusion

- 5.1.1 The screening concluded that a number of policies were screened in for further SA in light of the proposed modifications (PMs). The screening has led to a reappraisal of policies SS1, SS2, SS9, SS10, SS11, SS12 and H1, in addition to the appraisal of proposed new policy GI2a.
- 5.1.2 For policies SS1, SS9, SS10, SS11, SS12 and H1 no changes to the appraisal scoring have been identified but a number of changes to the commentary have been made. For the proposed new policy GI2a, significant positive effects were assessed against health (SA Objective 2), access for all (SA Objective 5), biodiversity (SA Objective 8) and land use (SA Objective 9). However, negative effects were assessed with regards to the effect on housing (SA Objective 1) and a mix of minor positive and negative effects on the economy (SA Objective 4) due to the expected impacts on delivery of housing on windfall sites. However, there is some uncertainty regarding the presence and extent of negative effects. No changes were identified for SS2.
- 5.1.3 The HRA (October 2020) evidence also led to a review of the appraisal of sites ST7, ST8, ST9 and ST14. Significant negative effects were identified for these sites against biodiversity (SA Objective 8) predominantly for their potential to have likely significant effects (LSE) on Strensall Common SAC. Following Appropriate Assessment, the effects on European sites considered under biodiversity (SA Objective 8) can be mitigated for these sites through the implementation of mitigation in policies within the Local Plan Publication Draft (as proposed to be modified). Due to the distance from Strensall Common SAC (with some sites nearly 5km away) some uncertainty as to the effect was also identified, due to the potential for recreational activity to be taken closer to the site. For site ST7, minor positive effects were also assessed, as per the original appraisal of the site, due to the potential to improve the porosity of the urban area to wildlife.
- 5.1.4 Changes to the cumulative appraisal have also been identified for housing (SA Objective 1) and the economy (SA Objective 4) in light of the appraisal of proposed Policy GI2a. It was identified that the Green Infrastructure section will have mixed minor positive and negative effects, with uncertainty, on these SA Objectives due to the impact on housing development and associated economic effects.

5.2 Next Steps

- 5.2.1 This addendum to the SA Report (Feb 2018) is a supporting document to the City of York Local Plan Publication Draft – Proposed Modifications Consultation (May 2021). The Council is not inviting further comments on the submitted Plan where there are no proposed modifications.
- 5.2.2 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.
- 5.2.3 The consultation runs for 6 weeks from **25th May** to midnight on **7th July 2021**.
- 5.2.4 Your comments should be made using a representation form available to complete via York Council's website: www.york.gov.uk/localplanconsultation.
- 5.2.5 Alternative format response forms are also available from the website or by contacting the Forward Planning Team directly via localplan@york.gov.uk or 01904 552255.
- 5.2.6 Please state clearly which Proposed Modification number (PM) or document your response relates to.

Appendix A

SA implications from the Proposed Modifications

Appendix A

SA implications from the Proposed Modifications

The following schedule sets out the screening of the Proposed Modifications (PMs) for Sustainability Appraisal (SA) implications. The plan location refers to the Local Plan Publication Draft (February 2018). For some of the PMs this schedule supersedes the schedule contained in the SA Report Addendum (June 2019) Appendix A. Text that is proposed to be deleted is struck through (~~example~~) and additions are shown underlined and bold text (**example**).

Modification Reference Number	Plan Location	Proposed Modification	Reason for Changes	Is the proposed modification considered significant for the purposes of SA?
PM 47 - Whole Plan reference change - 'post plan period'.	Whole plan, where applicable.	Remove references to 'post plan period' from the Plan.	In association with the below, clarification of provision beyond the Plan period to deliver a permanent green belt.	Yes. The proposed change clarifies the post plan period. Although clarification does not change the plan period in itself the SA should be reviewed to ensure that the plan period is clear.
PM 48 - Whole Plan reference change – 'plan period'.	Whole plan, where applicable.	Amend plan wide references to plan period to 2017-2032/33.	Clarification of Plan period.	Yes. The proposed change clarifies the plan period. Although clarification does not change the plan period in itself the SA should be reviewed to ensure that the plan period is clear.
PM 49 - Policy SS1:	Page 26 of the Publication Draft Local Plan (February 2018)	New text, as follows: Development during the plan period (2017 - 2032/33) will be consistent with the priorities below. <u>To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of 5 years to 2038.</u>	Clarification of Plan period and provision beyond the Plan period to deliver a permanent green belt.	Yes. The proposed change clarifies the plan period and the provision of additional land to ensure Green Belt permanence to 2038. Although the clarification does not change the plan period or approach to Green Belt in itself, the SA should be reviewed to ensure that the plan period is clear.
PM 50 - Policy SS1: <i>Note PM4 - [EX/CYC/20]</i>	Page 26 of the Publication Draft Local Plan (February 2018)	Text amendment, 2 nd bullet point, as follows: <ul style="list-style-type: none"> Deliver a minimum average annual net provision of 867 new dwellings 790 822 dwellings per annum over the plan period to 2032/33 and post plan period to 2037/38. <u>During the plan period provision has been made for a housing requirement of at least 13,152 new homes.</u> This will enable... 	Clarification of housing requirement over the plan period.	Yes. The proposed change specifically includes the addition of the identified annualised shortfall (32dpa) within the requirement. This in addition to the 790 dwellings per annum (previously proposed as a modification to 867 dpa requirement in Publication Plan). The figure of 790 dpa was appraised in the Addendum June 2019 (Appendix B). In the June 2019 SA Report Addendum changes were also made to the appraisal of Policy SS1 and Policy H1 in light of the revisions made to the requirement. This should also be reviewed.

				It is considered that sustainability effects of this requirement figure have been considered previously. However, the review will ensure the likely effects have been identified and considered.
PM 51 - Policy SS1:	Page 26 of the Publication Draft Local Plan (February 2018)	<p>New 3rd bullet point, text to read:</p> <ul style="list-style-type: none"> <u>Deliver 3 new permanent pitches for Gypsies and Travellers and 3 permanent plots for Showpeople (as defined by Planning Policy for Traveller Sites) over the plan period. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs the Plan makes provision for 44 permanent pitches for Gypsies and Travellers who do not meet the definition.</u> 	Clarification of defined and undefined Gypsy and Traveller Housing Need as part of planned approach to housing need.	Yes. The proposed change integrates reference to the requirement to meet the needs of Gypsies and Travellers. Although the requirements are set out in Policies H5 and H6, and have previously appraised, the SA should be reviewed in light of the additional bullet point.
PM 52 - Policy SS1:	Page 26 of the Publication Draft Local Plan (February 2018)	<p>Amended wording pertaining to the spatial principle bullet points to clarify the promotion of brownfield land and approach to locating development in sustainable locations:</p> <p>“The location of development through the plan will be guided by the following five spatial principles:</p> <ul style="list-style-type: none"> Conserving and enhancing York’s historic and natural environment. This includes the city’s character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function. <u>Prioritise making the best use of previously developed land.</u> <u>Directing development to the most sustainable locations,</u> ensuring accessibility to sustainable modes of transport and a range of services. Preventing unacceptable levels of congestion, pollution and/or air quality. Ensuring flood risk is appropriately managed. ...Where viable and deliverable, the re-use of previously developed land will be phased first.” 	Amended policy wording to clarify the Council’s approach to phasing in relation to brownfield land and sustainable location of development.	<p>Yes. The SA of the Publication Plan identified mixed positive and negative effects against SA Objective 9 (use of resources). This should be reviewed in light of the proposed change in emphasis on prioritising previously developed land.</p> <p>The proposed changes should also be reviewed in respect of SA Objective 6 (reduce the need to travel).</p>
PM 53 - Policy SS1: <i>Note PM4 - [EX/CYC/20]</i>	Whole Plan, where applicable	<p>To clarify the Council’s housing requirement, inclusive of shortfall.</p> <p>Amend household projections to <u>minimum average annual net provision of 822 dwellings over the plan period to 2032/33</u>’.</p>	Clarification of housing requirement over the plan period.	Yes. Please consideration of PM50 above.
PM 54 - Policy SS1: Explanation	Para 3.3	Text amendment, as follows:	Clarification of housing requirement over	Yes. These are consequential changes to the explanatory text to reflect changes to

<p>Note PM5 - [EX/CYC/20]</p>	<p>Page 27 of the Publication Draft Local Plan (February 2018)</p>	<p>Technical work has been carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017). This work has updated the demographic baseline for York based on the July 2016 household projections, to 867,790 per annum. Following consideration of the outcomes of this work, the Council aims to address an objectively assessed housing need of 790 homes per annum. This produces a housing requirement amounting to meet an objectively assessed housing need of 867,790 new dwellings per annum for the plan period to 2032/33, a minimum average annual net provision of 822 dwellings over the plan period to 2032/33, including an allowance for any a shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.</p>	<p>the plan period including an allowance for a shortfall in provision.</p>	<p>housing requirement. Please consideration of PM50 above.</p>
<p>PM 55 - Policy SS1: Explanation</p>	<p>Page 27 of the Publication Draft Local Plan (February 2018)</p>	<p>Inclusion of Spatial Strategy table and explanation linked to key diagram.</p> <p>“Explanation</p> <p><u>The Plan’s strategic policies set out an overall strategy for the pattern, scale and quality of development over the Plan period.</u></p> <p><u>The Plan focusses on identifying sufficient land to meet housing and economic growth (spatial drivers) in a pattern of development aligned to the factors which shape growth (spatial shapers) set out in SS1. Development is directed to the most sustainable locations, making as much use as possible of suitable previously developed land (with some release of green belt land). As is set out in SS1, sustainable growth for York emphasises conserving and enhancing York’s historic environment. The scale and pattern of development is guided by the need to safeguard a number of key elements identified as contributing to the special character and setting of the historic City. These include the City’s size and compact nature, the perception of York being a free-standing historic city set within a rural hinterland, key views towards the City from the ring road and the relationship of the City to its surrounding settlements.</u></p> <p><u>Development is focussed on the main urban area of York and in new free-standing settlements with some urban and village extensions. The development strategy limits the amount of growth proposed around the periphery of the built-up area of York. While new settlements will clearly affect the openness of green belt in those locations, their impact is considered to be less harmful to the elements which contribute to the special character and setting of York. Their size and location has taken into account the potential impact on those elements, and on the identify and rural setting of neighbouring villages.</u></p> <p><u>There will also be opportunities for rural exception sites, including for Gypsy and Travellers not meeting the PPTS definition of a gypsy or traveller; these small scale developments provide affordable homes in locations where new homes would not usually be appropriate.</u></p>	<p>Amended policy wording to clarify the Council’s approach to phasing in relation to brownfield land and to clarify range of sites delivered within the Spatial Strategy.</p>	<p>Yes. These are consequential changes to the explanatory text to reflect changes to housing requirement, plan period and Gypsy & Traveller provision within Policy SS1. Please see consideration of PM50, PM51 and PM52 above.</p>

The proposed distribution of development identified in the Plan's allocations and deliverable unimplemented consents is described in the following table (Table 1). The anticipated pattern of development as identified in the Plan's strategic allocations is shown on the Key Diagram.

KEY DIAGRAM

Table 1a Sources of supply over the Plan period 2017-2032/33

Total Target (requirement)*	13,152
Commitments (unimplemented permissions at 1st April 2017)	3,578
Strategic Housing Allocations (ST sites)	11,067
Housing Allocations (H sites)	1,452
Windfall allowance (from 2020/21 @169 dpa)	2,197
Total	18,294

***Requirement = annual requirement (790dpa) plus annualised shortfall (32dpa) x 16 years. Includes housing requirement for Gypsies and Travellers who do not meet the Planning definition.**

Defined Gypsy and Traveller housing requirement (Gypsies/Travelling Showpeople)	6 (3/3)
Site allocations	6 (3/3)
Total	6

Informed by our spatial development strategy, the anticipated distribution of allocated sites is reflected in Table 1b below.

Table 1b: Spatial Strategy: Distribution of Housing allocations

Spatial Locations*	Residential Strategic Allocations (ST sites)	Housing Allocations (H sites)	Total Homes**
Residential urban development	5448	1219	6,276
Residential urban extensions	1703	0	1,720
Residential village extensions	305	233	538

		<table border="1"> <tr> <td>New Settlements/ Garden Villages</td> <td>5532</td> <td>0</td> <td>5,532</td> </tr> <tr> <td>Total</td> <td>12,988</td> <td>1,452</td> <td>14,440</td> </tr> </table> <p>*Note: in the first instance, provision is made within larger allocations for those Gypsies and Travellers not meeting the Planning definition. Alternative provision in line with policy H5 may alter the overall stated spatial distribution.</p> <p>** Note: the figures in Table 1b include delivery of whole allocations which may extend beyond 2032/33 and for a minimum of 5 years to define a permanent Green Belt.</p> <p><u>Factors Which Drive Growth</u></p> <p><u>Economic Growth</u> Technical work on economic growth..."</p>	New Settlements/ Garden Villages	5532	0	5,532	Total	12,988	1,452	14,440		
New Settlements/ Garden Villages	5532	0	5,532									
Total	12,988	1,452	14,440									
PM 56 - Key Diagram	Key Diagram	Key diagram amendments to clarify strategic allocations and their locations in line with the spatial strategy and the removal of ST35.	To clarify range of sites delivered within the Spatial Strategy and to be consistent with the recommendations of the HRA (2020)	No. The proposed modification provides diagrammatic clarification of changes previously appraised in the June 2019 Sa Report Addendum. The change is not considered to have implications for SA.								
PM 57 - Key Diagram	Key Diagram	Key diagram moved to Spatial Strategy section of the Plan	To better relate Key Diagram to the spatial strategy.	No. The proposed modification is presentational. The change is not considered to have implications for SA.								
PM 58 - Policy SS9	Page 46 of the Publication Draft Local Plan (February 2018)	<p>Amend bullet point ix to:</p> <p><u>xi. Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. This must include:</u></p> <ul style="list-style-type: none"> ○ Create <u>Creation of a</u> new open space (as shown on proposals <u>policies</u> map <u>as allocation OS7</u>) to protect the setting of the Millennium Way that runs through the site. Millennium Way is a historic footpath which follows Bad Bargain Lane and is a footpath linking York's strays and should be kept open. A 50m green buffer has been included along the route of the Millennium Way that runs through the site to provide protection to this Public Right of Way and a suitable setting for the new development. ○ <u>Open space provision that satisfies policies GI2a and GI6</u> 	To ensure impacts identified in the HRA (2020) as a result of recreational pressure on Strensall Common SAC are mitigated.	<p>Yes. The proposed change to the policy strengthens the referencing to open space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure.</p> <p>The SA of Policy SS9 and associated Strategic Site ST7 should be reviewed in light of the changes.</p>								
PM 59 -	Page 48 of the Publication	Amend bullet point vi to:	To ensure impacts identified in the	Yes. The proposed change to the policy strengthens the referencing to open								

<p>Policy SS10</p>	<p>Draft Local Plan (February 2018)</p>	<p><u>vi. Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. This must include:</u></p> <ul style="list-style-type: none"> ○ Create <u>Creation of a</u> new open space on additional land to the east of the Monks Cross Link Road (as shown on the proposals <u>policies</u> map <u>as allocation OS8</u>). This land remains in the Green Belt. Open space provision should still be provided to the required quantum within the main allocation boundary and traffic calming measures should be provided along Monks Cross Link Road alongside the provision of pedestrian footways and safe crossing points. Ecological mitigation is also required on land to the east of the Link Road. ○ <u>Open space provision that satisfies policies GI2a and GI6</u> 	<p>HRA (2020) as a result of recreational pressure on Strensall Common SAC are mitigated.</p>	<p>space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure.</p> <p>The SA of Policy SS10 and associated Strategic Site ST8, should be reviewed in light of the changes.</p>
<p>PM 60 - Policy SS11</p>	<p>Page 50 of the Publication Draft Local Plan (February 2018)</p>	<p>Amend bullet point iii to:</p> <p><u>iii. Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. This must include:</u></p> <ul style="list-style-type: none"> ○ Create <u>Creation of a</u> new open space to the south of the site (as shown on the proposals <u>policies</u> map <u>as allocation OS9</u>) to reflect the needs of the Haxby and Wigginton ward including formal pitch provisions, informal amenity greenspace, play provision, cemeteries and allotments. The open space needs of the area should be assessed in detail, liaising with Haxby Town Council and Wigginton Parish Council, the neighbourhood plan group and local residents ○ <u>Open space provision that satisfies policies GI2a and GI6</u> 	<p>To ensure impacts identified in the HRA (2020) as a result of recreational pressure on Strensall Common SAC are mitigated.</p>	<p>Yes. The proposed change to the policy strengthens the referencing to open space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure.</p> <p>The SA of Policy SS11 and associated Strategic Site ST9 and should be reviewed in light of the changes.</p>
<p>PM 61 – Policy SS12</p>	<p>Page 54 of the Publication Draft Local Plan (February 2018)</p>	<p>New bullet point:</p> <p><u>xiv. Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. Open space provision must satisfy policies GI2a and GI6.</u></p>	<p>To ensure impacts identified in the HRA (2020) as a result of recreational pressure on Strensall Common SAC are mitigated.</p>	<p>Yes. The proposed change to the policy strengthens the referencing to open space provision within the policy, in light of the HRA (2020) which requires mitigation to be put in place to avoid adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure.</p> <p>The SA of Policy SS12 and associated Strategic Site ST14 should be reviewed in light of the changes.</p>
<p>PM 62 - Policy H1</p>	<p>Page 91 of the Publication Draft Local</p>	<p>Policy H1: Housing Allocations</p> <p>"In order to meet the housing requirement set out in Policy SS1 the following sites, as shown on the proposals map and set out in the schedule below are proposed for residential development.</p>	<p>Deleted policy wording to clarify the Council's approach,</p>	<p>Yes – the proposed change includes the removal of criteria relating to the phasing of development. The SA should be reviewed.</p>

	Plan (February 2018)	<p>Planning applications for housing submitted for these allocations will be permitted is in accordance with the phasing indicated. An application on an allocated site in advance of its phasing will be approved if:</p> <ul style="list-style-type: none"> • The allocation's early release does not prejudice the delivery of other allocated sites phased in an earlier time period; • The release of the site is required now to maintain a five year supply of deliverable sites; and • The infrastructure requirements of the development can be satisfactorily addressed." 	removing reference to phasing sites.																																																													
<p>PM 63 - Policy H1; Table 5.1 Housing Allocations</p> <p><i>Note PM18 and PM19 – [EX/CYC/20]</i></p>	Page 92 of the Publication Draft Local Plan (February 2018)	<table border="1"> <thead> <tr> <th>Allocation Reference</th> <th>Site Name</th> <th>Site Size (ha)</th> <th>Estimated Yield (Dwellings)</th> <th>Estimated Phasing</th> </tr> </thead> <tbody> <tr> <td>H1#</td> <td>Former Gas Works, 24 Heworth Green (Phase 1)</td> <td>2.87</td> <td>271</td> <td>Short to Medium Term (Years 1 - 10)</td> </tr> <tr> <td>H1#</td> <td>Former Gas works, 24 Heworth Green (Phase 2)</td> <td>0.67</td> <td>65</td> <td>Medium Term (Years 6-10)</td> </tr> <tr> <td>H3***</td> <td>Burnholme School</td> <td>1.90</td> <td>72</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H7***</td> <td>Bootham Crescent</td> <td>1.72</td> <td>86</td> <td>Short to Medium Term (Years 1 - 10)</td> </tr> <tr> <td>H22#</td> <td>Former Heworth Lighthouse</td> <td>0.29</td> <td>15</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H23#</td> <td>Former Grove House EPH</td> <td>0.25</td> <td>11</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H31#</td> <td>Eastfield Lane Dunnington</td> <td>2.51</td> <td>76</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H46***</td> <td>Land to North of Willow Bank and East of Haxby Road, New Earswick</td> <td>2.74</td> <td>104</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H52#</td> <td>Willow House EPH, Long Close Lane</td> <td>0.20</td> <td>15</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H55#</td> <td>Land at Layerthorpe</td> <td>0.20</td> <td>20</td> <td>Short Term (Years 1 - 5)</td> </tr> <tr> <td>H56***</td> <td>Land at Hull Road</td> <td>4.00</td> <td>70</td> <td>Short Term (Years 1 - 5)</td> </tr> </tbody> </table>	Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing	H1#	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short to Medium Term (Years 1 - 10)	H1#	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)	H3***	Burnholme School	1.90	72	Short Term (Years 1 - 5)	H7***	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 - 10)	H22#	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 - 5)	H23#	Former Grove House EPH	0.25	11	Short Term (Years 1 - 5)	H31#	Eastfield Lane Dunnington	2.51	76	Short Term (Years 1 - 5)	H46***	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short Term (Years 1 - 5)	H52#	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 - 5)	H55#	Land at Layerthorpe	0.20	20	Short Term (Years 1 - 5)	H56***	Land at Hull Road	4.00	70	Short Term (Years 1 - 5)	Additional reference to those sites which will need to consider the impact on European designated sites within proximity in the context of development proposals brought forward	<p>Yes. The proposed change sees the deletion of a strategic site (ST35) following the conclusions of the HRA (Feb 2019).</p> <p>The implications for the SA due to the proposed deletion were reviewed in the June 2019 SA Report Addendum and no further SA is required at this stage.</p> <p>However, the SA should be reviewed to consider the implications of the additional cross reference to Policy GI12 and GI12a in light of the findings of the updated HRA (2020).</p>
Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing																																																												
H1#	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short to Medium Term (Years 1 - 10)																																																												
H1#	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)																																																												
H3***	Burnholme School	1.90	72	Short Term (Years 1 - 5)																																																												
H7***	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 - 10)																																																												
H22#	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 - 5)																																																												
H23#	Former Grove House EPH	0.25	11	Short Term (Years 1 - 5)																																																												
H31#	Eastfield Lane Dunnington	2.51	76	Short Term (Years 1 - 5)																																																												
H46***	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short Term (Years 1 - 5)																																																												
H52#	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 - 5)																																																												
H55#	Land at Layerthorpe	0.20	20	Short Term (Years 1 - 5)																																																												
H56***	Land at Hull Road	4.00	70	Short Term (Years 1 - 5)																																																												

		H58#	Clifton Without Primary School	0.70	25	Short Term (Years 1 - 5)			
		H59**#	Queen Elizabeth Barracks – Howard Road, Strensall	1.34	45	Medium to Long Term (Years 6 – 15)			
		ST4#	Land Adjacent to Hull Road	7.54	211	Short to Medium Term (Years 1 - 10)			
		ST7#	Land East of Metcalfe Lane	34.5	845	Lifetime of the Plan (Years 1 - 16)			
		ST8#	Land North of Monks Cross	39.5	968	Lifetime of the Plan (Years 1 - 16)			
		ST9#	Land North of Haxby	35.0	735	Lifetime of the Plan (Years 1 - 16)			
		ST14#	Land West of Wigginton Road	55.0	1,348	Lifetime of the Plan and Post Plan period (Years 1 - 21)			
		ST15#	Land West of Elvington Lane	159.0	3,339	Lifetime of the Plan and Post Plan period (Years 1 - 21)			
		ST17#	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 - 10)			
		ST17#	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)			
		ST32#	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)			
		ST35	Queen Elizabeth Barracks – Strensall	28.8	500	Medium to Long Term (Years 6 – 15)			

		<p>*Allocated for specialist housing (Use Class C3b^[1]) for residential extra care facilities in association with the Wilberforce Trust.</p> <p>** Sites that contain existing open space</p> <p># Given the site's proximity to a European Designated Nature Conservation Site (see explanatory text), this site must take account of Policy GI2 and GI2a.</p>		
		<p>See also Policy GI2, GI2a GI5 and GI6.</p>		
<p>PM63a- Policy H1 Housing Allocations</p> <p><i>Note PM20a and PM20c –</i></p> <p><i>[EX/CYC/20]</i></p>	<p>Fig 5.1, Page 96 of the Publication Draft Local Plan (Feb, 2018)</p>	<p>PM63a – Update to Figure 5.1: Housing Trajectory to 2033 to reflect a housing requirement of 822 dpa – see Associated Figures and Tables (page 28 of Proposed Modifications Schedule)</p>	<p>To align the housing trajectory with the updated housing requirement evidence through Housing Need Update [EXCYC43a]</p>	<p>Yes - The proposed change to supporting text gives effect to the change in housing requirement in Policy SS1 within PM50. It is considered material to the outcomes of the appraisal of Policy H1.</p>
<p>PM63b- Policy H1 Housing Allocations</p> <p><i>Note PM21a and PM21c –</i></p> <p><i>[EX/CYC/20]</i></p>	<p>Table 5.2, Page 97 of the Publication Draft Local Plan (Feb, 2018)</p>	<p>PM63b – Update to Table 5.2: Housing Trajectory to 2033 to reflect the revised OAN of 822 dpa – See Associated Figures and Tables (page 29 of Proposed Modifications Schedule)</p>	<p>To align the housing trajectory with the updated housing requirement evidence through Housing Need Update [EXCYC43a]</p>	<p>Yes - The proposed change to supporting text gives effect to the change in housing requirement in Policy SS1 within PM50. It is considered material to the outcomes of the appraisal of Policy H1.</p>
<p>PM 64 - Policy H1: Explanation</p>	<p>Para 5.13</p> <p>Page 99 of the Publication Draft Local Plan (February 2018)</p>	<p>...The timescale of each site is an indication of when we think the Council considers the site is likely to come forward and reflects the timescale put forward by the landowner or developer in the discussions referred to above,...</p>	<p>Amended wording to clarify the Council's approach to phasing.</p>	<p>No. The proposed modification is to explanatory text. The proposed modification is not considered to have implications for SA.</p>

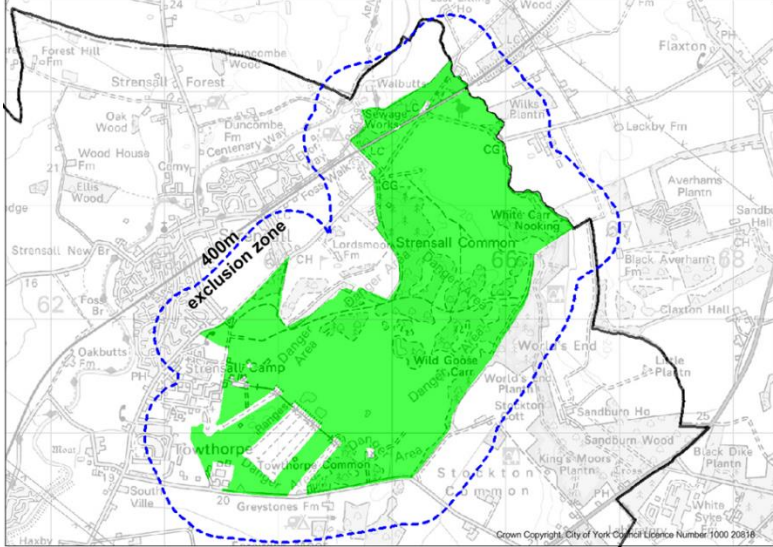
[1] C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems. The [Town and Country Planning \(Use Classes\) Order 1987](#) (as amended)

PM 65 - Policy H1: Explanation	Page 99 of the Publication Draft Local Plan (February 2018)	<p>New Paragraph:</p> <p><u>The development of residential site allocations within 5.5km of Strensall Common SAC has been found to lead to an increase in recreational pressure on Strensall Common SAC. The development of sites within this distance from the SAC must accord with Policy GI2a [New Strensall Common SAC Policy]</u></p>	To ensure impacts identified in the HRA (2020) as a result of recreational pressure on Strensall Common SAC are mitigated.	No. The proposed modification is to explanatory text. The proposed modification is not considered to have implications for SA.
PM 66 - Policy H5	Page 106 of the Publication Draft Local Plan (February 2018)	<p>Policy H5, text amendment as follows:</p> <p>b) Within Strategic Allocations</p> <p>In order to meet the need of those 44 Gypsies and Traveller households that do not meet the planning definition:</p> <p>Applications for larger development sites of 5ha or more will be required to <u>provide a number of pitches within the site or provide alternative land that meets the criteria set out in part c) of this policy to accommodate the required number of pitches. Commuted sum payments to contribute to development of pitches elsewhere will only be considered where on/off site delivery is proven unviable.</u></p> <ul style="list-style-type: none"> • Provide a number of pitches within the site; or • Provide alternative land that meets the criteria set out in part c) of this policy to accommodate the required number of pitches; or <p>Provide commuted sum payments to contribute towards to development of pitches elsewhere.</p>	To strengthen the policy approach to on-site delivery for those Gypsy and Travellers not meeting the Planning definition, encouraging on-site provision unless proven unviable.	No. The proposed change strengthens the policy approach to Gypsy and Traveller pitch provision. The policy scored significant positively against housing (SA Objective 1) and the proposed change is considered to reinforce the appraisal findings. No changes are required.
PM 67 - Policy GB4	Page 180 of the Publication Draft Local Plan (February 2018)	<p>Policy GB4, text amendment as follows:</p> <p>The development of affordable housing on exception sites in the Green Belt, <u>including for Gypsy and Travellers</u>, is not inappropriate development and will be considered where:...</p>	To clarify that GB4 makes provision for small scale affordable sites for Gypsies and Travellers not meeting the PPTS definition of a Gypsy or Traveller, to address need that may not be accommodated on strategic sites through policy H5.	No. The proposed change confirms the approach to sites for Gypsy and Travellers in the Green Belt. The policy scored minor positive against SA Objective 1 (housing) in the Publication Plan SA Report in recognition of the provision for affordable housing exception sites. It is not considered that the proposed change would lead to any likely significant effects.
PM 68 - Policy GB4:	Page 180 of the Publication	New paragraph 10.25, as follows:	To clarify that GB4 makes provision	No. The proposed modification is to explanatory text. The proposed

Explanation	Draft Local Plan (February 2018)	<u>10.25 It is the Council's intention that policy GB4 should apply to the delivery of affordable sites for gypsy and travellers not meeting the planning definition, accommodating households who are either current residents or have an existing family or employment connection. Unlike a rural exception site, exception sites for affordable housing in the Green Belt can be mixed use, accommodating yards for Showpeople where appropriate.</u>	for small scale affordable sites for Gypsies and Travellers not meeting the PPTS definition of a Gypsy or Traveller, to address need that may not be accommodated on strategic sites through policy H5.	modification is not considered to have implications for SA.
PM 69 - Policy GB4: Explanation	Page 180 of the Publication Draft Local Plan (February 2018)	New policy cross-reference, as follows: See also Policy SS1, GB1, GB2, H5, H6 , H10, D1 and D2.	To provide appropriate cross reference to support the modifications to GB4 described above.	No. The proposed modification is to explanatory text. The proposed modification is not considered to have implications for SA.
PM 70 - New Policy GI2a	New policy GI2a	New policy as follows: <u>GI2a: Strensall Common Special Area of Conservation (SAC)</u> <u>Development not directly connected with or necessary to the management of the SAC will only be permitted where it will not adversely affect the integrity of the Strensall Common SAC, either alone or in combination with other plans or projects. Proposals will be determined in accordance with the following principles:</u> a) <u>There is an 'exclusion zone' set at 400m linear distance from the SAC boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for non-residential development within this zone must undertake Habitats Regulation Assessment to demonstrate that they will not harm the integrity of the SAC.</u> b) <u>There is a 'zone of influence' between 400m and 5.5km linear distance from the SAC boundary.</u> i. <u>Where new residential development is proposed within the zone of influence on allocated housing sites SS9/ST7, SS10/ST8, SS11/ST9 and SS12/ST14, provision of open space must include or secure access to areas of suitable natural greenspace secured by way of mitigation prior to any occupation of new dwellings and secured in perpetuity.</u> ii. <u>Proposals for other housing development which are not within plan allocations will not be permitted unless it can be demonstrated that they will have no</u>	Bespoke policy for Strensall Common to ensure adverse effects as a result of development is avoided and mitigated. This proposed modification complies with the outcomes and recommendations of the HRA (2020) for consistency.	Yes – the proposed new policy should be appraised.

		<p><u>adverse effects on the integrity of the SAC, either alone or in combination with other plans or projects. Any necessary mitigation measures may be sought through planning contributions and must be secured prior to the occupation of any new dwellings and secured in perpetuity. Open space provision must also satisfy policy GI6.</u></p>		
<p>PM 71 -</p> <p>New Policy</p> <p>Justification</p>		<p><u>Justification</u> <u>Strensall Common is designated as a Special Area for Conservation (SAC) and Site of Special Scientific Interest (SSSI). It also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered.</u></p> <p><u>At over 570ha, it supports one of the largest areas of lowland heath in northern England. Extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands/scrub and ponds. Grazing, by sheep and cattle is the key management tool with stock typically present during summer and autumn. The heathland supports a diverse flora and fauna including such characteristic (and vulnerable) species such as nightjar, woodlark, marsh gentian, pillwort, pond mud snail and dark bordered beauty moth, with Strensall Common representing the only site for this species in England.</u></p> <p><u>Strensall Common is managed by the Yorkshire Wildlife Trust and Ministry of Defence (MOD) who operate an extensive training facility and firing range within and adjacent to the European site.</u></p> <p><u>The heath is subject to considerable recreational pressure from visitors, especially those with dogs. Although an established network of paths and periodic closures of part of the heath by the MOD (to facilitate training activities) can influence visitor behaviour. However, both the dry and wet heath habitats are particularly vulnerable to trampling, erosion and vandalism such as fire, fly-tipping, pollution and other activities associated with visitor pressure. Although the common is already under intense recreational pressure, there are birds of conservation concern amongst other species and habitats which could be harmed by the intensification of disturbance.</u></p> <p><u>In 2011, all of Strensall Common SSSI was considered by Natural England to be in favourable or unfavourable-recovering condition. However, the corresponding Site Improvement Plan identifies a number of threats including, inter alia, public pressure and air pollution. Natural England's Supplementary Advice (2019) highlights the threat posed to the maintenance of the grazing regime by the worrying and subsequent disturbance of livestock by dogs brought by visitors.</u></p>	<p>Bespoke policy for Strensall Common to ensure adverse effects as a result of development is avoided and mitigated. This proposed modification complies with the outcomes and recommendations of the Local Plan HRA (2020)</p>	<p>Yes – Although the proposed change is explanatory text, rather than policy, it supports a proposed new policy (PM 70).</p>

		<p><u>In addition, the heathland habitat is vulnerable to changes in the hydrological regime and air quality, which will need to be considered and assessed in detail for any proposed development.</u></p> <p><u>The Habitat Regulation Assessment (2020) has established that adverse effects on the integrity of the common cannot be ruled out without mitigation. The HRA suggests that residential development allocations (in Policy H1) within 5.5km of the common are likely to lead to an increase in recreational pressure which will require mitigation in the form of suitable natural greenspace and such other measures as may be considered necessary to prevent an adverse effect on the integrity of the SAC. Relevant policies/sites include strategic sites SS9(ST7), SS10 (ST8), SS11(ST9), SS12(ST14), SS15(ST17) and Policy H1 (allocation H46). The delivery of appropriate recreational open space on these sites will also need to be considered in line with policy G16. The HRA also anticipates that unallocated windfall development may come forward, although it is not possible at this stage to predict precisely where it will be proposed. To ensure that it does not cause any adverse effect on the integrity of the SAC, the HRA recommends the following policy controls: (1) no net additional dwellings will be permitted within 400m of the SAC, as it is not considered possible to prevent adverse effects from development in such close proximity to the SA; (2) where windfall development is proposed between 400m and 5.5km from the SAC, permission will not be granted unless it can be demonstrated that the proposals will not have an adverse effect on the integrity of the SAC, both in respect of the proposals themselves and in combination with other development; (3) any necessary measures which avoid or reduce such effects must be provided before first occupation and established in perpetuity. The Council will have to consider whether planning obligations will be required, including financial contributions to secure such measures. Proposals must also comply with Policy G16 which requires that all residential proposals contribute to the provision of open space, in particular helping to address deficiencies in the area surrounding a proposed development.</u></p> <p><u>Applicable 400m development exclusion zone</u></p>		
--	--	---	--	--

				
PM72 - Hogg's Pond	Policies Map South	<p>It is proposed that the green belt boundary runs along the southern carriageway edge of Moor Lane Woodthorpe</p> <p>See maps in Annex 1</p>	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM73 - Acomb Water Works	Policies Map North	<p>It is proposed that the green belt boundary should follow the fenced edge of Acomb Water Works and follow the river banks.</p> <p>See maps in Annex 1</p>	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM74 - St Barnabas School	Policies Map North	<p>It is proposed that the green belt boundary should follow the built edge of the school buildings</p> <p>See maps in Annex 1</p>	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM75 - St Peters School	Policies Map North	<p>It is proposed that the green belt boundary should follow the built edge of the school buildings</p> <p>See maps in Annex 1</p>	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary and is not considered to have implications for the SA.

PM76 - Homestead Park	Policies Map North	It is proposed that the green belt boundary should follow the walled and fenced edge to the formal gardens of Homestead Park See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary to reflect the defined boundary to the park and is not considered to have implications for the SA.
PM77 - 27 Shipton Road	Policies Map North	It is proposed that the green belt boundary should follow the rear and side boundary of 27 Shipton Road See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM78 - Clifton Park Hospital	Policies Map North	It is proposed that the green belt boundary should follow the built development boundary See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology.	Yes. The proposed change to the Green Belt boundary reflects existing, established development. However, the development is substantial. Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed.
PM79 - Burton Stone Primary School	Policies Map North	It is proposed that the green belt boundary should follow the built edge of the School See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM80 - Nestle Factory	Policies Map North	It is proposed that the green belt boundary should follow the fenced boundary to the factory See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology. To correct a drafting error	No. The proposed modification is a minor change to the Green Belt boundary to reflect the defined boundary to the factory and is not considered to have implications for the SA.
PM81 - Joseph Rowntree School	Policies Map North	It is proposed that the green belt boundary should follow the built edge of the School See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM82 - Edge of Monks Cross/ Vanguard Car parks	Policies Map North	It is proposed that the green belt boundary should follow the built carriageway edge and Car Parking See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt Methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development and carriageway edge. It is

			To represent changes since first drafted to reflect the new Askham Bar Park & Ride boundary	not considered to have implications for the SA.
PM83 - Pottery Lane	Policies Map North	It is proposed that the green belt boundary should follow the rear of the properties on Pottery Lane See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt Methodology To represent changes since first drafted to reflect the Properties built to this edge	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM84 - Osbaldwick Gypsy and Traveller site	Policies Map North	It is proposed that the green belt boundary should follow the edge of completed development See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency to represent completed planning consent	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM85 - University of York Campus East, Eastern Boundary	Policies Map South	It is proposed that the green belt boundary should follow the edge of the park and ride, Lakeside Way and the built indoor sports provision See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development and carriageway. It is not considered to have implications for the SA.
PM86 - University of York Campus East, Western Boundary	Policies Map South	It is proposed that the green belt boundary should follow the northern lake side and the built edge of consented development. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology To represent planning consent	No. The proposed modification is a minor change to the Green Belt boundary to reflect development with consent. It is not considered to have implications for the SA.

PM87 - Heslington	Policies Map South	It is proposed that the green belt boundary should follow the edge of dense built development See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	Yes. The proposed change to the Green Belt boundary reflects existing, established development. However, the changes include substantial built development within Heslington, south of the University campus. Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed.
PM88 - Heslington Lane south of University of York Campus West	Policies Map South	It is proposed that the green belt boundary should follow the edge of completed development rather than the allocated site which incorporates open paddock land See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing carriageway surface. It is not considered to have implications for the SA.
PM89 - Heslington Road and The Retreat	Policies Map South	It is proposed that the green belt boundary should follow the south carriageway edge Heslington Lane and Thief Lane and the edge of built development at the Retreat See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.

PM90 - Imphal Barracks	Policies Map South	It is proposed that the green belt boundary should follow the built up edge of existing built development See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM91 - Germany Beck and Fordlands Road	Policies Map South	It is proposed that the green belt boundary should follow the southern edge of Thornton Road and the built up edge to the north of Fordlands Road Estate. Recreation Ground becomes Green Belt. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development around the recreation ground. It is not considered to have implications for the SA.
PM92 - Rowntree Park	Policies Map South	It is proposed that the green belt boundary should follow the fenced edge to Rowntree park and cut across the River at this point. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect defined boundary to the park and is not considered to have implications for the SA.
PM93 - York Racecourse	Policies Map South	It is proposed that the green belt boundary should follow the edge of the built footprint of dense development and the edge of the carriageway of Racecourse Road. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM94 - Scarcroft Allotments	Policies Map South	It is proposed that the green belt boundary should continue to follow the western edge of Albermarle Road See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary and is not considered to have implications for the SA.
PM95 - York College	Policies Map South	It is proposed that the boundary should follow the currently identifiable features of the edge of the existing sports pitch to the east and the northern carriageway of Sim Balk Lane to the south See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing identifiable development features. It is not considered to have implications for the SA.
PM96 - Derwent Valley Industrial Estate	Policies Map North	It is proposed that the green belt boundary should follow the defined field boundary. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology – open land helps retain the setting of Dunnington.	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.

PM97 - Elvington Primary School	Policies Map South	It is proposed that the green belt boundary should follow the edge of the built edge of the school See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM98 - Elvington Airfield Industrial Estate	Policies Map South	It is proposed that the green belt boundary should follow the edge of carriageway, inseting the road. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary and is not considered to have implications for the SA.
PM99 - Poppleton Primary School	Policies Map North	It is proposed that the green belt boundary should follow the built edge of the school. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	No. The proposed modification is a minor change to the Green Belt boundary to reflect existing built development. It is not considered to have implications for the SA.
PM100 - Stockton on the Forest	Policies Map North	It is proposed that the green belt boundary should follow the fenced edge of the development. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	Yes. The proposed change to the Green Belt boundary reflects existing, established development. However, the changes include substantial built development within Stockton on the Forest. Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed.
PM101 - Strensall	Policies Map North	It is proposed that the green belt boundary should follow the edge of the densely developed site. See maps in Proposed Modifications Schedule Annex 1	Reason: Consistency with the Green Belt methodology	Yes. The proposed change to the Green Belt boundary reflects existing, established development. However, the changes include substantial areas of built development, including part of the Strensall Barracks site (which had previously partially been included in the Publication Plan as Site ST35, and was proposed to be removed as part of the June 2019 modifications). Policy SS2 sets the policy for the role of York's Green Belt and it is considered the appraisal of the policy should be reviewed.

<p>PM102 – Campleshon Road open space</p>	<p>Policies Map South</p> <p>Policy G16 in the Local Plan</p>	<p>Insert new bullet point to policy G16 as a new open space identified on the policies map:</p> <ul style="list-style-type: none"> • <u>OS13: Open Space associated with York Racecourse</u> <p>See associated figures page</p>	<p>Reason: To protect this area of amenity space in conjunction with uses at York Racecourse.</p>	<p>No. the appraisal of Policy G16 set out a high-level appraisal of the open space provision and did not make specific reference to the open spaces identified. The changes are considered to reinforce the significant positive effects assessed in relation health (SA Objective 2), access for all (SA Objective 5) and green infrastructure (SA Objective 8).</p>
--	---	--	---	--



Appendix B

Updated Appraisal of Housing Growth Figures



Appendix B

Updated appraisal of the housing growth figure

The re-appraisal of the proposed change to the housing requirement utilises the same matrices and text as the SA Report Addendum (June 2019) Appendix B. Where changes to the appraisal commentary have been identified these are presented in underline for additional text or with ~~striketrough~~ for deleted text. Where the text is not underlined or struck through it is the original appraisal text taken from the SA Report SA Report Addendum (June 2019) appendix and has not been changed.

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – <u>790 822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
1. To meet the diverse housing needs of the population in a sustainable way.					<p><u>Likely Significant Effects</u></p> <p>The proposed modifications preferred housing figure reflects the economic led housing need figure in the Housing Needs Update, January 2019, prepared for City of York Council by GL Hearn. The Housing Needs Update, January 2019 (GL Hearn) is based on the 2016 subnational population projections for York, published in 2018, which are lower than the 2014 based projections (which informed the identification of the Publication Draft preferred figure of 867dpa and SHMA Update 2017 alternative of 953). The figure has been identified under transitional arrangements for implementation of the revised NPPF.</p> <p>The figure is based on an economic led need for housing based on economic growth of 650 jobs per annum. This figure is higher than the baseline demographic starting point (484 dpa) with the incorporation of a 15% uplift from the baseline for affordability (which leads to an OAN of 557 dpa).</p> <p>The proposed figure of <u>790 822</u> dpa would therefore meet the objectively assessed housing needs in the plan period (<u>and incorporate the annualised shortfall of 32 dpa</u>). It has therefore been assessed as resulting in minor positive effects in the short and medium term and long term reflecting that the preferred housing figure would positively contribute to the delivery of a range of housing types and tenures in locations across the City to meet identified need in the evidence base.</p> <p>The Publication Plan figure (867dpa) has been assessed as having positive effects in the short, medium and long term. In the SA Report (2018) the</p>
	Short Term	+	+	+	

	Medium Term					<p>preferred option was assessed as having minor positive effects in the short and medium term and negative effects in the long term. However, this was based on the 2017 SHMA Update evidence which suggested that the preferred figure did not meet the identified OAN at that time (953dpa). With the publication of the 2019 SHMA Update, the basis of this appraisal has been superseded. The former preferred option has therefore been re-appraised as having positive effects in the long term, reflecting that it meets (and exceeds) the OAN.</p> <p>The 953dpa reasonable alternative reflects the previous OAN figure identified by GL Hearn in the 2017 SHMA Update (867 dpa baseline with market signals adjustment). This has been assessed as resulting in minor positive effects in the short and medium term increasing to significant positive effects in the long term. The scale of housing delivery associated with this figure would meet housing demand based on the most recent population forecasts and would support the delivery of affordable housing. Analysis by GL Hearn in the 2017 SHMA Update identifies a shortfall in housing provision against previous targets. This past under delivery of housing may suggest that there is a 'backlog' of need.</p> <p>The Government's 2017 consultation methodology figure of 1,070 dpa / <u>finalised in December 2020 Indicative Local Housing Need (LHN) figure of 1,026</u> represents a significant uplift on the preferred figure (790 822 dpa) and the Publication Draft preferred figure (867dpa), and an increase on the reasonable alternative of 953dpa. The Government's <u>consultation</u> figure derived from the proposed standard methodology for calculating need. This was based on 2014 household projections for 2016-2026 with a formula applied to reflect median house price to median income affordability ratios in York for 2016. <u>The Government released a new indicative LHN figure in December 2020 of 1,026 dpa based on the finalised standard method and more recent affordability ratios and is considered to perform the same as the 1,070 dpa consultation figure. Reference is made to the Standard Methodology figure from now on.</u> The figure would be likely to drive significant positive effects in the medium term. The Government's <u>Standard Methodology consultation</u> figure option is not directly comparable over the same time period as for the plan; however, it is assumed for this assessment that the dpa target would be carried forward in the long term. Although long term effects have been assessed as significantly positive this is to some</p>
--	-------------	--	--	--	--	--

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method).</u>	
					<p>extent uncertain due to the 10 year period of the Government’s consultation housing need figure.</p> <p><u>Mitigation</u> None.</p> <p><u>Assumptions</u> It is assumed that the delivery of housing will accord with the Spatial Strategy for York; namely to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement.</p> <p><u>Uncertainty</u> The assessment of likely effects depends on the monitoring of housing delivery through the plan period in line with housing need incorporated into the Local Plan.</p> <p>There is some uncertainty related to the Government’s consultation figure option over the long term due to the time period covered by the figure (2016-2026) which is less than the Plan Period covered by the proposed modifications preferred figure, the Publication Draft figure and SHMA 2017 Update alternative figure.</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
	Long Term	+	+	++	++/?
2. Improve the health and wellbeing of York’s population	Short Term	-	-	-	-
	Medium Term	-	-	-	-
	Lo	-	-	-/?	-/?

Likely Significant Effects
 Housing growth is likely to generate minor, temporary adverse effects on health in the short term during construction (e.g. as a result of emissions to air from HGV movements and plant). In the longer term, new housing could also adversely affect health due to, for example, emissions and increased traffic. Whilst effects will be dependent on the exact location of new development and its proximity to sensitive receptors, it can be assumed that new housing would be delivered within and in close proximity to existing residential areas.

It is anticipated that all of the housing figures would involve accommodating development at greenfield sites which could result in the loss of open space. The Government’s Standard Methodology 2017 consultation figure option is likely to generate the requirement for a larger release of greenfield land.

However, the provision of housing could also lead to improvements in health, particularly for those residents who may be able to move from poor quality housing to newer properties. Poor housing condition is recognised as a key determinant of overall health. This may be particularly apparent with regards to older affordable housing stock and poor quality private rented accommodation. It would be expected that the higher housing figures would

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 <u>822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>enable the development of higher number of affordable homes. The effects in the long term of the higher figures may therefore be potentially positive. However, the existence and extent of any positive effects is uncertain and dependent on the implementation and number of other factors.</p> <p>The preferred option and the SHMA 2017 Update reasonable alternative have both been appraised negatively over the short, medium and long term.</p> <p>All of the housing figures have been appraised negatively over the short, medium and long term. The SHMA 2017 Update reasonable alternative figure (953dpa) and Government’s 2017 consultation <u>indicative LHN figure (1,070 1,026 dpa)</u> may have a greater effect than the lower proposed modifications preferred figure (<u>822 790</u>dpa) and Publication Plan figure (867dpa) over the long term although this is unlikely to be significant. There may be positive effects although these are uncertain.</p> <p>Mitigation New housing development may provide opportunities to incorporate health facilities, open space and measures to facilitate walking and cycling. Local planning policy should be put in place to minimise impacts on health. Additionally, regulatory requirements to limit detrimental effects on health and wellbeing, beyond the remit of the local plan, will also mitigate effects.</p> <p>Assumptions None</p> <p>Uncertainty None</p>

SA Objective	Housing Figure				Commentary on the effects of each option	
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .		
3. Improve education, skills development and training for an effective workforce.	Short Term	+	+	+	+	<p>Likely Significant Effects</p> <p>Investment in new development has the potential to stimulate increased investment in new facilities by generating demand (through the influx of new residents) and through developer contributions. Any investment in educational facilities and services would support educational attainment, which is recognised as being good within the City of York area.</p> <p>Furthermore, the proposed modifications preferred housing growth option, Publication Plan figure and 2017 SHMA Update alternative housing figure are expected to help deliver student accommodation and a new settlement may encourage additional educational provision. The Government’s <u>Standard Methodology</u> consultation figure option would similarly enable this development and in the long term has the potential to have significant effects for additional investment in local education services and in helping to retain those who have developed skills in the local workforce.</p> <p>Overall, the proposed modifications preferred figure (822-790dpa), Publication Plan figure (867dpa) and the 2017 SHMA Update alternative (953dpa) have been assessed as having minor positive effects on this objective. The <u>Standard Methodology</u> Government’s 2017 consultation figure option is assessed as having significant positive effects in the long term.</p> <p>Mitigation None.</p> <p>Assumptions None.</p> <p>Uncertainty</p>
	Medium Term	+	+	+	+	
	Long Term	+	+	+	++	

SA Objective	Housing Figure				Commentary on the effects of each option	
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .		
					There is a risk that development may increase pressure on existing educational facilities and in particular primary schools within the City.	
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	Short Term	+	+	+	<p>Likely Significant Effects</p> <p>Housing development will generate economic benefits associated with construction e.g. direct job creation, supply chain benefits and increased spend in the local economy by contractors and construction workers. However, effects in this regard will be temporary and the extent to which the jobs that may be created will benefit the City of York’s residents will depend on the number of jobs created and the recruitment policies of prospective employers.</p> <p>In the medium and longer term, new housing and associated population growth will in turn help enhance the viability and vitality of existing businesses within central York as well as other centres.</p> <p>All options could support the objectives of the York Economic Strategy 2016 – 2020 and help ensure that York would benefit from investment through the Leeds City Region, Local Enterprise Partnership, and the Northern Powerhouse programme.</p> <p>The proposed modifications preferred housing figure (822,790dpa) has been developed to take account of jobs growth forecasts in the SHMA 2019 Update. It has been assessed as having minor positive effects in the short, medium and long term. The Publication Plan figure (867dpa) is also considered to have similar effects.</p>	
	Medium Term	+	+	+		++
	Long Term	+	+	++		++

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>The 2017 SHMA Update alternative housing figure (953dpa) will provide a scale of housing growth to support economic growth and as such it is considered to have significant positive effects in the long term.</p> <p>The <u>Standard Methodology Government’s 2017 consultation</u> figure option would help enable significant positive effects in the medium term by driving the housing development industry in the City and supporting economic development helping to meet objectives of the York Economic Strategy. These significant effects are likely to be felt sooner than the 2017 SHMA Update alternative growth figure.</p> <p>Overall, the proposed modifications preferred housing figure (822790dpa), Publication Plan figure (867dpa) and SHMA 2017 Update alternative (953dpa) have been assessed as having minor positive effects on this objective. The SHMA 2017 Update alternative housing figure (953dpa) figure is considered to have a significant positive effect in the long term, due to benefits derived from the quantum of development proposed. The Government’s <u>Standard Methodology 2017 consultation</u> figure has been assessed as having significant positive effects in the medium and long term as the scale of proposed housing would mean such benefits are more likely to accrue earlier.</p> <p>Mitigation None.</p> <p>Assumptions None.</p> <p>Uncertainty</p>

SA Objective	Housing Figure				Commentary on the effects of each option	
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .		
					The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.	
5. Help deliver equality and access to all	Short Term	+	+	+	<p>Likely Significant Effects</p> <p>All four options would assist in meeting, but not fully, the net affordable housing requirement of 573 dwellings per annum as identified in the 2016 SHMA (and 2019 SHMA Update).</p> <p>Residential development of the scale proposed under all the housing need figures has the potential to improve the viability and vitality of existing shops, services and facilities in the areas where growth is located. New development may also encourage and support investment in existing, and the provision of new, services and facilities in the City of York through, for example, the receipt of developer contributions. This could help enhance the accessibility of existing and prospective residents to key services and facilities, although this would be dependent on the exact location of new development and the level of investment generated. However, depending on where new development is located, there is the potential for growth to increase pressure on existing community facilities and services.</p> <p>The Local Plan Site Selection Methodology identifies the need to locate development with sustainable access to facilities and service and to ensure sustainable access for transport.</p> <p>The preferred housing figure option has been assessed as having minor positive effects on this objective in the short, medium and long term. The 2017 SHMA Update alternative housing growth option and the Government’s</p>	
	Medium Term	+	+	+		++
	Long Term	+	+	++		++

SA Objective	Housing Figure				Commentary on the effects of each option	
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .		
					<p>Standard Methodology consultation figure option have been assessed as having minor effects in the short term and a significant positive effect in the long term. The additional housing associated with Government’s <u>Standard Methodology</u> consultation figure option is also likely to generate significant effects on this objective in the medium term through additional investment in services linked to higher levels of development.</p> <p>Mitigation None.</p> <p>Assumptions That affordable housing policy requirements in Publication Draft Policy H10 is implemented by the City Council.</p> <p>Uncertainty None.</p>	
6. Reduce the need to travel and deliver a sustainable	Short Term	+/-	+/-	+/-	+/-	<p>Likely Significant Effects No significant effects have been identified for the proposed modifications preferred figure (822 790dpa), Publication Plan figure (867dpa) or the 2017 SHMA Update alternative (953dpa). However, a mix of minor positive and</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
integrated transport network	Medium Term	+/-	+/-	+/-	<p>significant mixed negative effects have been assessed for the Government’s <u>Standard Methodology 2017 consultation</u> figure (1,070dpa).</p> <p>Focusing development in accordance with the Council’s spatial strategy would have positive effects on the objective as it would significantly encourage people to live close to the town centres where services and facilities are more accessible, reducing the need to travel and provide for sustainable developments. Housing growth could also help to maintain existing, and (potentially) stimulate investment in new, public transport provision in the City of York area.</p> <p>The scale of a stand-alone settlement is likely to vary with each of the options with the result that the highest growth option will result in the development of a new local centre(s) and facilities which could help reduce the need for out-commuting.</p> <p>In the short term (during construction) and once development is complete there is likely to be an increase in transport movements and associated congestion.</p> <p>Overall, the levels of growth proposed under the proposed modification preferred figure (822 790dpa), Publication Plan figure (867dpa) or the 2017 SHMA Update alternative (953dpa) have been assessed as having minor positive and negative effects on this objective.</p> <p>The Government’s <u>Standard Methodology consultation</u> figure (1,070dpa) is assessed having the potential for a mix of minor positive and significant negative effects in the long term. Positive effects could arise from focusing housing growth around existing (or new) service centres and from increased</p>
	Long Term	+/-	+/-	+/-	

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>transport infrastructure investment, whilst negative effects would arise from the overall higher levels of private car use and associated traffic congestion.</p> <p>Mitigation Measures should be put into effect to ensure consistency with the requirements of paragraph 17 of the NPPF (2012) which identifies as a core principle of planning the active management of patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made, sustainable.</p> <p>Assumptions None.</p> <p>Uncertainty None.</p>
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	Short Term	-	-	-	<p>Likely Significant Effects No significant effects have been identified for the proposed modification preferred figure (822 790dpa), Publication Plan figure (867dpa) or the 2017 SHMA Update alternative (953dpa). However, significant effects have been identified for the Government’s <u>Standard Methodology figure (1,026dpa) 2017 consultation figure (1,070dpa)</u> in the long term.</p> <p>Minor negative effects are anticipated to arise from housing growth generating an increase in greenhouse gases both during construction (e.g.</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
Medium Term	-	-	-	-	due to emissions from HGV movements and plant and associated with embodied carbon in construction materials) and once development is complete (e.g. due to increased traffic generation and energy use in new dwellings). The scale of these effects will be most significant for the Government’s <u>Standard Methodology figure 2017 consultation figure</u> option. Having said that, the occupation of more energy efficient buildings (with more efficient boilers, insulation, and possible low carbon energy generation) could mean that carbon production per occupant would be lower than for existing older housing stock. This could help mitigate some of the effects.
Long Term	-	-	-	--	<p>As highlighted under SA Objective 6, housing growth could help to maintain existing, and (potentially) stimulate investment in, public transport provision in the area which could help to minimise greenhouse gas emissions associated with car use.</p> <p>It is recognised that Government intends to ban new petrol and diesel cars from 2040 which will have an effect on new car purchasing behaviour in advance of this date. However, through the plan period, the number of existing cars on the roads with internal combustion engines is expected to still far outweigh electric vehicles and so vehicle greenhouse gas emissions will be expected to be substantial. The scale of these effects will be most significant for the Government’s <u>Standard Methodology consultation figure</u> option (1,02670dpa) and most minor for the proposed modification preferred figure (822 790dpa).</p> <p>Overall, the growth under the proposed modification preferred option (790dpa), Publication Plan figure (867dpa) and 2017 SHMA Update reasonable alternative (953dpa) have been assessed as having minor negative effects on this objective in the short, medium and long term. The</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>Government’s <u>Standard Methodology</u> figure consultation-figure option has been assessed as having minor effects in the short and medium term and significant negative effects in the long term.</p> <p>Mitigation There may be opportunities to promote and encourage sustainable modes of transport alongside new development. Policies in the Local Plan should encourage their development.</p> <p>Assumptions None.</p> <p>Uncertainty The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain).</p> <p>Housing growth may present opportunities to increase investment in transport infrastructure and renewable energy.</p>
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora	Short Term	-/?	-/?	-/?	<p>Likely Significant Effects No significant effects have been identified for the proposed modification preferred option (822 790dpa), Publication Plan figure (867dpa) or 2017 SHMA Update reasonable alternative (953dpa) although significant effects</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
and fauna for accessible high quality and connected natural environment	Medium Term	-/?	-/?	-/?	are considered likely in the long term for the Government’s <u>Standard Methodology</u> consultation figure option.
	Long Term	-/?	-/?	-/?	<p>Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value at international, national, regional and local levels of importance. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn are home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle.</p> <p>Housing growth could have an adverse effect on biodiversity as a result of land take/habitat loss and disturbance during construction and increased recreational pressure once development is complete.</p> <p>It is likely that the levels of growth proposed in all the options will require development on greenfield sites with consequential effects on biodiversity and nature conservation. The proposed modification preferred option (790dpa), Publication Plan figure (867dpa) and 2017 SHMA Update reasonable alternative (953dpa) have been assessed as having a negative effect on this objective, whilst due to the scale of the Government consultation figure option, there is potential for this option to have a significant effect in the long term.</p> <p>However, the implementation of Local Plan policies related to biodiversity will mitigate some of the adverse effects (through avoidance and enhancement measures). In addition, the selection of sites, through the application of the Local Plan Site Selection Methodology identifies the need to protect environmental assets (including nature conservation).</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 <u>822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>The presence of designated European (and international) conservation sites in the City of York area will necessitate a Habitats Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017. The findings of the assessment may require additional measures to be taken to avoid any adverse effects on the designated sites which will need to be reflected in Local Plan policies.</p> <p>Residential development at the level presented in all four options may provide opportunities to enhance the existing, or incorporate new, green infrastructure. This could potentially have a positive or significantly positive effect on this objective by improving the quality and extent of habitats and by increasing the accessibility of both existing and prospective residents to such assets.</p> <p>Overall, the proposed modification preferred option (<u>822</u> 790dpa), Publication Plan figure (867dpa) and 2017 SHMA Update reasonable alternative (953dpa) have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain. Due to the additional scale of growth, the Government’s <u>Standard Methodology figure</u> consultation figure option is likely to have significant effects in the long term, although there is some uncertainty as effects will be dependent on actual development locations and proximity to sensitive conservation sites.</p> <p>Mitigation Measures to retain and enhance features of biodiversity interest e.g. species rich grassland and hedgerows on development sites should be adopted.</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>Local Plan policies should support improvements to the green infrastructure network and connecting biodiversity networks.</p> <p>Assumptions None of the development sites to be taken forward in the local plan will have an adverse effect on features of international importance.</p> <p>Uncertainty The effects of development on biodiversity which will be dependent to an extent on the location of development, the nature of detailed proposals and the outcome of site specific investigation, which at this stage are uncertain.</p>
9. Use land resources efficiently and safeguard their quality.	Short Term	-	-	-	<p>Likely Significant Effects No significant effects have been identified for the proposed modification preferred housing growth option (822 790dpa), Publication Plan figure (867dpa) or the SHMA 2017 Update alternative option (953dpa). However, significant effects have been identified in the medium and long term for the Government’s <u>Standard Methodology figure consultation figure</u>.</p>
	Medium Term	-	-	-	<p>Whilst effects against this objective are largely dependent on the location of development, which at this stage is uncertain, it is expected that all of the options will necessitate the need for some development on greenfield sites. This likely requirement has therefore been assessed as having a negative effect on this objective.</p>
	Long Term	-	-	-	<p>The NPPF (2012) says that planning should “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”. The Council should encourage developers to consider whether there is previously developed land</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>available in suitable locations for new development, rather than locating development on undeveloped land.</p> <p>The Council should encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on undeveloped land.</p> <p>Overall, the housing growth proposed under the proposed modification preferred option (822 790dpa), Publication Plan (867dpa) and SHMA 2017 Update alternative (953dpa) are considered to have minor negative effects on this objective. However, the Government’s consultation housing need figure option is assessed as having significant negative effects in the medium and long term with the cumulative increase in housing over this period, and the consequent greater loss of greenfield land. However, this could be mitigated to some extent through the prioritisation of brownfield sites and application of higher development densities.</p> <p>Mitigation The Local Plan policies should encourage the re-use of previously developed and co-location of facilities and services to make the best use of development sites.</p> <p>Assumptions It is assumed that development sites would avoid development on best and most versatile land and encourage development on previously developed land.</p> <p>Uncertainty None.</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
10. Improve water efficiency and quality.	Short Term	-	-	-	<p>Likely Significant Effects No significant effects have been identified for all options.</p> <p>Housing will result in increased water consumption both during construction and in the longer term once development is complete and occupied.</p> <p>The increase in local population is expected to increase the demand on water resources, which has the potential for a negative effect on water quality. Yorkshire Water’s Water Resources Management Plan 2014 has assessed the demand and supply of water for the forthcoming 25 years until 2039/40. The demand forecast model has inbuilt assumptions regarding the projected population, household formation, the projected effects of climate change, leakage, implemented water efficiency measures and assumed new homes in accordance with Requirement G2 and Regulations 36 and 37 of the Building Regulations 2010.</p> <p>York lies within the Grid SWZ zone within Yorkshire Water’s area, which identifies a deficit between supply and demand from 2018/19 is 2.67MI/d, increasing to 108.65MI/d by 2039/40. A range of solutions are proposed to ultimately meet the forecast supply demand deficit in the Grid SWZ as well as development of existing or new assets. The options selected include leakage reduction, use of an existing river abstraction licence, three groundwater schemes and customer water efficiency. As the plan period stretches out, there is less certainty with regard to the mix of measures to be used and they are also likely to be revised in the next WRMP, to be adopted in 2019. The Revised Draft WRMP 2019 (Sep 2018) identifies that the Grid SWZ is expected to be in deficit in the mid 2030s. Measures in the 2014 WMRP and 2019 WMRP covering 2020 to 2045 would be expected to help ensure that future water resource demands are met.</p>
	Medium Term	-	-	-	
	Long Term	-	-	-	

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 <u>822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p><u>The WRMP (2019) published in April 2020) does not expect a deficit until the mid-2030s for the water resource zone in which York is located due to revised approach to climate change modelling.</u></p> <p>Overall, the housing growth linked to the preferred figure in the proposed modifications (<u>822</u> 790dpa), the Publication Plan preferred figure (867dpa), and the SHMA 2017 Update (953dpa) reasonable alternative have been assessed as having a minor negative effect against this objective.</p> <p>The Government’s <u>Standard Methodology</u> consultation housing need figure option has been assessed as having minor negative effects – although in the long term there is some uncertainty relating to the extent of these effects (which may well be greater). The extent of the negative effects is dependent on the implementation of efficiency measures.</p> <p><u>Mitigation</u> Customer water efficiency measures which could be incorporated on the development include water metering, water harvesting and the regulation of tap and shower flows. Implementation of efficiency measures has the potential to result in a reduction of per capita in water consumption, however the uptake of these measures is not yet known. The Local Plan should incorporate policies that seek standards within new development that address water efficiency.</p> <p><u>Assumptions</u> None.</p> <p><u>Uncertainty</u></p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					The extent to which the uptake of efficiency measures may lessen the negative effects in the long term.
11. Reduce waste generation and increase level of reuse and recycling.	Short Term	-	-	-	<p>Likely Significant Effects No significant effects are anticipated.</p> <p>Housing growth will result in resource use, particularly during the construction of new dwellings. Residential development will generate construction waste, although it is anticipated that a proportion of this waste would be reused/recycled. Occupation of the new houses will also lead to an increase in domestic waste and recycling volumes, with the scale of waste arisings proportional to the number of houses proposed.</p> <p>Overall, all housing requirement options have been assessed as having a minor negative effect on this objective.</p>
	Medium Term	-	-	-	<p>Mitigation The performance of the selected housing figure will benefit from ensuring that recycling facilities are included in the design to ensure any waste created once the development is in operation is minimised.</p> <p>Local Plan policies should encourage the use of recycled and secondary materials in new developments and promote the reuse of construction and demolition wastes.</p>
	Long Term	-	-	-	<p>Assumptions None</p> <p>Uncertainty</p>

SA Objective	Housing Figure				Commentary on the effects of each option	
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .		
					None	
12. Improve Air Quality	Short Term	-/?	-/?	-/?	-/?	<p>Likely Significant Effects Housing growth will result in increased emissions to air both during construction (e.g. due to emissions from HGV movements ad plant) and once development is complete (e.g. due to increased traffic generation).</p> <p>Development in accordance with the spatial strategy is likely to see a strong emphasis upon housing delivery within and around the main urban area and close to existing public transport links and main centres, reducing the requirement to travel by private car.</p>
	Medium Term	-/?	-/?	-/?	-/?	<p>The levels of growth proposed under the proposed preferred housing option, Publication Plan preferred option and SHMA 2017 Update alternative have been assessed as having a negative effect, albeit with some uncertainty concerning the magnitude and significance of the effects due to the uncertainties over development locations.</p> <p>The Government’s 2017 consultation housing growth option is also considered likely to have similar effects. However, the effects may be greater in line with the scale of housing dependent the locations chosen for development.</p>
	Long Term	-/?	-/?	-/?	-/?	<p>Mitigation The effects of the proposed housing growth under the figures outlined could be mitigated by the application of other Local Plan policies that seek to reduce congestion and support investment in public transport.</p> <p>Assumptions</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>None.</p> <p>Uncertainty The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.</p>
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	Short Term	-/?	-/?	-/?	<p>Likely Significant Effects No significant effects have been identified.</p> <p>Parts of York are identified as being at significant risk of fluvial flooding and so there is the potential for negative effects to occur associated with flood risk. However, until the quantum of development is agreed and location of new development is known, the effects are considered to be uncertain.</p>
	Medium Term	-/?	-/?	-/?	<p>It is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies avoiding areas of high flood risk (greenfield sites in flood zone 3a) as Criteria 3.</p> <p>Overall, the effect of all three options are considered to be negative / uncertain.</p>
	Long Term	-/?	-/?	-/?	<p>Mitigation As set out above, site selection will be informed by the Local Plan Site Selection Methodology and application of Policies related to flood risk and sustainable urban drainage.</p> <p>Assumptions</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					None <u>Uncertainty</u> None
14. Conserve or enhance York’s historic environment, cultural heritage, character and setting.	Short Term	-	-	-	<p><u>Likely Significant Effects</u> No significant effects have been identified.</p> <p>The historic environment of the City of York is of international, national, regional and local significance. York’s wealth of historic assets include: York Minster; over 2000 listed buildings; 22 scheduled monuments including the City Walls, York Castle, Clifford’s Tower and St Mary’s Abbey; four Registered historic parks and gardens, which include the Museum Gardens and Rowntree Park; and a large number of designated conservation areas.</p> <p>Housing growth could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. There may also be opportunities for housing growth to enhance the settings of heritage assets as well as access to them.</p> <p>The levels of housing need to be accommodated in all four options are likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the Local Plan Site Selection Methodology which identifies the need to protect environmental assess (including historic character and setting) and the implementation of other plan policies related to conserving and enhancing the historic environment.</p>
	Medium Term	-	-	-	
	Long Term	-	-	-	

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 <u>822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method</u> .	
					<p>The level of effects associated with the proposed preferred option (<u>822</u> 790dpa) and Publication Plan preferred figure (867dpa) and 2017 SHMA Update (953dpa) alternative housing figures are likely to be similar to one another; although this will depend upon the selection of individual sites. SHMA 2017 Update The effects of the Government’s <u>Standard Methodology</u> consultation figure option are also likely to be similar. However, as a basic principle, the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the SHMA 2017 Update alternatives (867dpa and 953 dpa) (compared to the proposed preferred figure of <u>822</u> 790dpa) and the even higher level of growth associated with the Government’s <u>Standard Methodology</u> consultation need figure (1,0<u>26</u>70 dpa).</p> <p>This effect is dependent on the specific approach to meeting the identified need through polices and proposals.</p> <p>Mitigation Local Plan policies should ensure that historic environment is conserved and enhanced in accordance with the NPPF.</p> <p>Assumptions It is assumed that the development sites in the Local Plan will be subject to a Heritage Impact Appraisal to assess whether the sites and policies of the Local Plan will conserve and enhance the special characteristics of the city.</p> <p>Uncertainty None</p>

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 822 dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – Standard Methodology (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ Indicative LHN of 1,026 dpa using Dec 2020 finalised method).	
15. Project and enhance York’s natural and built landscape.	Short Term	-	-	-	<p>Likely Significant Effects No significant effects have been identified.</p> <p>The landscape includes a range of features of natural, historical, and cultural significance that contribute to the special qualities of the City of York.</p> <p>Housing growth could have an adverse effect on landscape character associated with the need to direct some development (under all housing figures) onto greenfield sites. Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short term during construction and once development is complete.</p> <p>Housing growth may also present opportunities to improve townscape which could have a long term positive effect on this objective.</p> <p>All of the figures have been appraised as having negative effects on this objective. The Government’s <u>Standard Methodology</u> consultation figure could have greater effects than the preferred (822 790dpa) reasonable alternative related to the 2017 SHMA Update (867dpa and 953dpa) figures due to the higher level of growth required to meet the identified need. In a similar way to the assessment against SA Objective 14, the general principle may be applied that the greater the number of houses the greater the effect on the landscape. However, this effect is dependent on the specific approach to meeting the identified need through policies and proposals within the Local Plan.</p> <p>Mitigation It is considered that adverse effects should be mitigated through the application of Local Plan policies related to the protection of the landscape.</p>
	Medium Term	-	-	-	
	Long Term	-	-	-	

SA Objective	Housing Figure				Commentary on the effects of each option
	Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – <u>790 822</u> dpa 2017-2033	Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033	Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033	Alternative Housing Figure – <u>Standard Methodology</u> (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026/ <u>Indicative LHN of 1,026 dpa using Dec 2020 finalised method).</u>	
					<p>Assumptions None</p> <p>Uncertainty None</p>



Appendix C

Updated Appraisal of Strategic Sites



Appendix C

Updated Appraisal of Strategic Sites

The updated appraisal of Strategic Sites utilises the same matrices and text as the SA Report (2018) Appendix I. 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 SA Report (Feb 2018) appendix and has not been changed.

Please note that for ST15 'Land West of Elvington Lane' SA Objective 8, the text is taken from the SA Report Addendum (May 2019) Appendix C. For this objective the text includes the changes to the SA Report (2018) in underline and strikethrough but 2019 amendments are in **bold**. New changes are in ***bold italics***.

Please note the page numbers below refer to Appendix I of the SA Report (Feb 2018). The whole matrices are not repeated here. To reflect the review of sites in relation to HRA (October 2020) evidence, the appendix only shows the relevant scoring and commentary in relation to biodiversity (SA Objective 8).

Key

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect
+	The policy is likely to have a positive effect
0	No significant effect / no clear link
?	Uncertain or insufficient information on which to determine effect
-	The policy is likely to have a negative effect
--	The policy is likely to have a significant negative effect

Part 1 – Allocated Strategic Sites and their boundary alternatives

ST1: BRITISH SUGAR / FORMER MANOR SCHOOL	7
ST2: FORMER CIVIL SERVICE SPORTS GROUND	14
ST4: EAST OF GRIMSTON BAR	23
ST5: YORK CENTRAL	33



ST7: EAST OF METCALFE LANE	47
ST8: NORTH OF MONKS CROSS	65
ST9: LAND NORTH OF HAXBY	81
ST14: LAND TO THE WEST OF WIGGINTON ROAD	95
ST15: LAND TO THE WEST OF ELVINGTON LANE	114
ST16: FORMER TERRY'S CHOCOLATE FACTORY EXTENSION SITES	140
ST17: NESTLÉ SOUTH	152
ST19: NORTHMINSTER BUSINESS PARK	163
ST20: CASTLE GATEWAY	173
ST26: SOUTH OF AIRFIELD BUSINESS PARK, ELVINGTON	184
ST27: UNIVERSITY OF YORK EXPANSION	194
ST31: LAND AT TADCASTER ROAD, COPMANTHORPE	207
ST32: HUNGATE	217
ST33: STATION YARD, WHELDRAKE	227
ST35: QUEEN ELIZABETH BARRACKS, STRENSALL	237
ST36: IMPHAL BARRACKS, FULFORD ROAD	250
ST37: WHITEHALL GRANGE	264

NB: SITE WITH IMPLEMENTED PLANNING PERMISSION ARE NOT REASSESSED IN THIS APPENDIX. SEE APPENDIX K (SA REPORT FEB 2018) FOR THE AUDIT TRAIL OF SITE ALLOCATIONS.

ST7: East of Metcalfe Lane

(Allocation Site ref: 850)

SA Objective	Sub-objective (Will the site...?):	Allocation boundary (site 850)		Alternative 1 (site 986)		Alternative 2 (site 981)		Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	+	-	+	-	+	-	<p>Likely Significant Effects</p> <p>This site would need to incorporate and consider green infrastructure as set out by policies within the Local Plan, relating to their creation, preservation and enhancement.</p> <p>The location of this site is predominantly arable farmland interspersed hedgerows. The alternative boundaries are larger and therefore take comparably more arable land than the allocation. The site's location is not in close proximity within 4.8km to nationally/internationally designated nature conservation sites <u>Strensall Common (SAC). This distance is within the 5.5km range wherein residents predominantly travel to Strensall Common for recreational use.</u></p> <p><u>The Habitat Regulation Assessment (2020) screens in the potential for adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure resulting from development at ST7. This is as a result of survey data confirming the development would likely result in an uplift of 1.6% in combination with two other allocations (ST17/H46) without mitigation. The lack of an overt mitigation role and criteria to influence the scale and scope of the open space required ensures that prior to any mitigation, there is insufficient confidence to rule out an adverse effect on the integrity of Strensall Common. However, the introduction of suitable and effective policy requirements to ensure the delivery and management in perpetuity of open space, including suitable alternative greenspace to mitigate the possible effects of recreational pressure on Strensall Common, in conjunction with existing Policy G16 'New Openspace', would be sufficient to provide, beyond reasonable scientific doubt, the necessary confidence to avoid an adverse effect. This would ensure that development proposals on this site must demonstrate that appropriate amenity requirements for the population of new residents and mitigation requirements for effects on the SAC are evidenced and masterplanned into the scheme in order to satisfy and be in conformity with the associated policy (SS9). Demonstration of this must include suitable alternative greenspace that is natural or semi-natural in form and of sufficient quality to attract new residents in preference to visiting Strensall Common. Associated policy SS9 should be updated to reflect this recommendation.</u></p> <p><u>On the basis that the HRA (2020) screens in the site as having potentially adverse effects, the site without consideration of mitigation scores a significant negative effect. However, there is uncertainty in relating to this given the distance between the site and Strensall Common and the resultant eventual impact. In any event, the policy recommendations to SS9, new policy G12a and strengthened links to policy G16 should ensure that significant effects are avoided or mitigated.</u></p> <p>The nearest designated site is 200m to the south and is a Candidate SINC: 'Metcalfe Lane Meadows' which is 2.2ha of neutral grassland and pond. A full habitat assessment is required to ensure any other interest features on the site can be taken into account.</p>

ST7: East of Metcalfe Lane

(Allocation Site ref: 850)

SA Objective	Sub-objective (Will the site...?):	Allocation boundary (site 850)	Alternative 1 (site 986)	Alternative 2 (site 981)	Commentary*
					<p>Green corridors also cross over both of the sites. On the northern part of the site is District corridor: Old Foss Beck, to the south District corridor: Osbaldwick Tang Hall Corridor and in the middle Local Corridor: Heworth Cycle Corridor. Green Corridors are a fundamental element of green infrastructure as they form linkages between assets making green infrastructure a network as opposed to a collection of sites. This has the potential to improve the porosity of the urban area to wildlife and provide an attractive access network. There is an opportunity for the site to link into this to ensure biodiversity corridors can be maintained across and linked through the site.</p> <p>Initial ecological investigations on the site undertaken by the site promoter have identified the green corridor as an ecological asset within the site. In addition, this identified that two ponds to the south have recorded sightings of Great Crested Newts and five other ponds either within proximity all having potential to support Great Crested Newts. There are a number of potential ecological constraints identified as follows:</p> <ul style="list-style-type: none"> • Ground nesting birds and breeding birds across the site including boundary features such as hedges; • Bats roosts within the mature trees within and surrounding the site; • Amphibians including Great crested newts; • SINC designations (Sites of Interest for Nature Conservation) <p>The initial appraisal suggests that there is potential for bats, breeding birds, badgers, water vole and otters. Further habitat studies are required to establish the species on site to enable appropriate mitigation to be planned into ongoing masterplanning.</p> <p>The main area of important habitat is the second tier wildlife site that lies in a strip of land to the south of the ponds and Bad Bargain Lane. It runs directly underneath the pylons and is a designated a Site of Interest for Nature Conservation (SINC). This area does not receive statutory protection in the same way as a Site of Special Scientific Interest (SSSI), they are protected as far as possible under policies within the Local Plan. Further work is necessary to understand the impacts of development. It is anticipated that the allocation boundary and both alternatives may have a potentially negative effect on this SINC.</p> <p>The site will also be required to include on-site provision of open space which could help for connecting with green infrastructure throughout the site. Different types of space should be provided to provide a diverse range of recreational opportunities. Similarly, the site should provide spaces for people to access and enjoy the natural environment. The quantum of openspace should be commensurate the scale of the new community and therefore more openspace would be required for the larger alternatives boundaries in comparison to the allocation. This is subject to policies set out in the Local Plan.</p> <p>On balance, a cautionary approach needs to be taken with this site given that further work is required through ecological studies <u>and requirement for the implementation of mitigation aligned with recommendations set out in the HRA (2020)</u>. Whilst there is the potential to have a direct long-term positive effect from access to the natural environment and provision of openspace creating green linkages, it is subject to further study and identification of suitable mitigation. It has therefore been <u>continued to have been</u> assessed as having minor positive and negative effects on this objective. <u>However, the outcomes of th HRA (2020) has changed the minor negative to a significant negative effect score acknowledging that there is some uncertainty identified and mitigation is suggested to avoid/mitigate significant adverse effects.</u></p> <p>Mitigation</p> <p><i>Ecological studies to be completed to enable further understanding of the sites ecological interest features.</i></p>

ST7: East of Metcalfe Lane

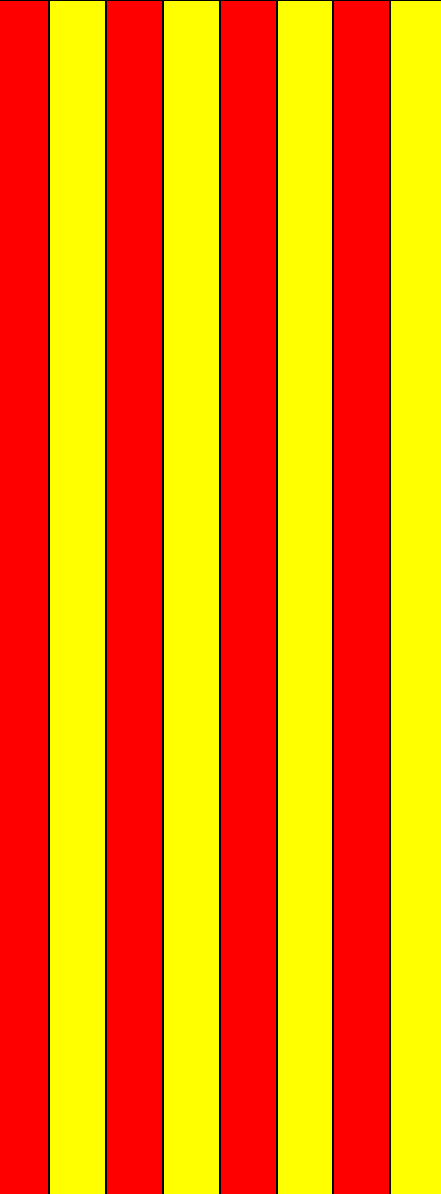
(Allocation Site ref: 850)

SA Objective	Sub-objective (Will the site...?):	Allocation boundary (site 850)		Alternative 1 (site 986)		Alternative 2 (site 981)		Commentary*
								<p>Phasing of development should prioritise locations away from any areas identified to have high ecological interest to minimise disturbance and allow any ecological enhancement to establish.</p> <p><u>To satisfy the requirements of the HRA, there needs to be provision of a detailed site wide recreation and open strategy, which is demonstrated in masterplanning.</u> A full Green Infrastructure Plan for the development should be developed, incorporating open space and a biodiversity management plan.</p> <p><u>Update to associated policy SS9 to reference the site wide recreation and openspace strategy and provisions to satisfy policies G16 and new policy G12a</u></p> <p>Assumptions</p> <p>A programme of further studies to be agreed between site promoters and CYC ecologists as part of the ongoing masterplanning process.</p> <p>Uncertainties</p> <p>The results of ecological studies currently under preparation and their requirements for mitigation.</p> <p>The implementation timescale of mitigation measures and their effectiveness in the long-term are uncertain. The scale and residual effects of development are therefore also uncertain.</p>

ST8: North of Monks Cross

(Allocation site ref: 849)

A Objective	Sub-objective (Will the site...?):	Allocation (site 849)		Alternative 1 (site 905)		Alternative 2 (site 913)		Alternative 3 (site 914)		Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora	Protect and enhance international and nationally significant	-	?	--	?	--	?	-	?	<p>Likely Significant Effects</p> <p>This site would need to incorporate and consider green infrastructure as set out by policies within the Local Plan, relating to their creation, preservation and enhancement.</p>

<p>and fauna for accessible high quality and connected natural environment.</p>	<p>priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCS);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>		<p>Impacts for all of the boundaries are appraised to similar given they all overlap the same area. The site is predominantly arable farmland comprising large fields interspersed with hedgerows. It is not in close proximity <u>within 2.5km</u> to nationally/internationally designated nature conservation sites <u>Strensall Commons (SAC)</u>. <u>This distance is within the 5.5km range wherein residents predominantly travel to Strensall Common for recreational use.</u></p> <p><u>The Habitat Regulation Assessment (2020) screens in the potential for adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure resulting from development at ST8. This is as a result of survey data confirming the development would likely result in an uplift of 3% in recreation without mitigation. The lack of an overt mitigation role and criteria to influence the scale and scope of the open space required ensures that prior to any mitigation, there is insufficient confidence to rule out an adverse effect on the integrity of Strensall Common. However, the introduction of suitable and effective policy requirements to ensure the delivery and management in perpetuity of open space, including suitable alternative greenspace to mitigate the possible effects of recreational pressure on Strensall Common, in conjunction with existing Policy G16 'New Openspace', would be sufficient to provide, beyond reasonable scientific doubt, the necessary confidence to avoid an adverse effect. This would ensure that development proposals on this site must demonstrate that appropriate amenity requirements for the population of new residents and mitigation requirements for effects on the SAC are evidenced and masterplanned into the scheme in order to satisfy and be in conformity with the associated policy (SS10). Demonstration of this must include suitable alternative greenspace that is natural or semi-natural in form and of sufficient quality to attract new residents in preference to visiting Strensall Common. Associated policy SS10 should be updated to reflect this recommendation.</u></p> <p><u>On the basis that the HRA (2020) screens in the site as having potentially adverse effects, the site without consideration of mitigation scores a significant negative effect. However, there is uncertainty in relating to this given the distance between the site and Strensall Common and the resultant eventual impact. In any event, the policy recommendations to SS10, new policy G12a and strengthened links to policy G16 should ensure that significant effects are avoided or mitigated.</u></p> <p>However, if the allocation and alternatives are within 400m of 2 Candidate SINCS; one to the north and one to the southwest. These areas would need to be considered sensitively in ongoing masterplanning to ensure that adverse effects are avoided. Alternative 3 would take development closer to the SINC in the north and may have more negative effects as a result of this.</p> <p>This area of York also has a number of ponds with known populations of Great Crested Newts. The populations of GNCs would be need to taken into consideration within any site design to ensure that the integrity of their environment can be maintained.</p> <p>A linear wildlife corridor has been created surrounding the existing Monks cross development which would need to be maintained in relation to development. The allocation boundary allows for a potential green corridor on the western edge of the site between the existing urban edge and the any new development. In addition, land to the east, not identified in the boundary of the site, is proposed for ecological enhancement, recreation and drainage mitigation. This would offer biodiversity enhancement opportunities. The alternative boundaries may compromise the green wedge by extending development towards the existing urban edge.</p> <p>In addition, initial ecology evidence gathered on behalf of the site promoter for an alternative boundary remains valid for the allocation and alternatives. This identified:</p> <ul style="list-style-type: none"> • Neutral grassland occupies approximately a large proportion of the site, the majority of which has at one point been subjected to some degree of agricultural improvement. Grassland in the site is nearly all species poor either through agricultural improvement or cessation of grazing leading to domination of coarse grasses. • The site supports a strong network of low to moderately diverse hedgerows, eleven of which can be defined as 'Important' under the Hedgerows Regulations 1997. • Due to the presence of many well connected ponds both on and surrounding the site, combined with the knowledge that great crested newt populations are present in the area, a survey was undertaken for GNCs. The results demonstrate that
---	--	--	---

<p>there is a small population of great crested newt present in two ponds on site with the discovery of eggs confirming that they are actively breeding. The immediate area contains good terrestrial habitat.</p> <ul style="list-style-type: none"> • The buildings are assessed as having either very limited or no bat roost potential. Many of the mature trees, however, have been found to support features with bat roost potential, such as cavities, split limbs and woodpecker holes. The vast majority of the site is considered to be of low importance to foraging bats. In addition the hedgerow network and mature trees represent a well-connected corridor through the site, which presents opportunities for localised foraging/commuting. Further survey revealed that Bat activity across the site was generally low, associated with common species and largely centred around a single farm track which runs off Garth Road. A small common pipistrelle roost was found within a tree located within a hedgerow in this location. • A breeding bird survey carried out revealed that a total of 47 species were recorded during the breeding bird survey. Of these, none were listed on Schedule 1 of the Wildlife and Countryside Act 1981, thirteen were listed on the UK Biodiversity Action Plan and/or the UK Red List and a further eight were listed on the UK Amber List. Though not recorded during the Ornithological registration mapping a barn owl roost is found on site and barn owls are thought to have bred on site in owl boxes the past. • The risk of reptiles occurring on site is considered to be very low and no further survey or precaution is deemed necessary in support of this. • A small amount of suitable water vole habitat is present on site in the form of ponds and drainage ditches; however these are small in extent and isolated from each other by pasture and arable fields. • Due to a lack of intensive management and structural complexity, some of the habitats on site, such as the rough grassland and ponds have the potential to support notable assemblages of invertebrates. Further survey work is ongoing to identify the invertebrate populations. <p>The site will also be required to include on-site provision of open space which could help for connecting with green infrastructure throughout the site. Different types of space should be provided to provide a diverse range of recreational opportunities. This would need to be commensurate to population and therefore it would be reasonable to expect the alternative boundaries to include more openspace than the allocation boundary. Similarly, the site should provide spaces for people to access and enjoy the natural environment. The strategic greenspace to be provided alongside the allocation and alternatives 2 and 3 is also positive in this respect to allow space for ecological mitigation to <u>in line with the HRA (2020) requirements; this must be for the delivery of suitable alternative green space.</u> In order to demonstrate how this is to be achieved, <u>a detailed site wide recreation and open space strategy is required and it's demonstration in site masterplanning.</u> masterplanning should include a green infrastructure/landscape strategy to ensure these benefits are maximised. Overall, this <u>could enable</u> site could be incorporated into the Green Infrastructure scheme on-site enabling a long-term positive outcome towards this objective.</p> <p>This site has a number of species and landscape features which need to be carefully considered and mitigated through masterplanning. <u>However, the outcomes of th HRA (2020) has changed the minor negative to a significant negative effect score acknowledging that there is some uncertainty identified and mitigation is suggested to avoid/mitigate significant adverse effects.</u> For this reason all of the sites have scored minor negative impacts with the exception of <u>Additionally;</u> alternative 3 which has a potential significant negative effect as a result of taking development closer towards a designed SINC. It is acknowledged that the scale of effects is subject to implementation and successful mitigation using the land to the east of Monks Cross Link road.</p> <p>Mitigation</p> <p><i>Phasing of development should prioritise locations away from any areas identified to have high ecological interest to minimise disturbance and allow any ecological enhancement/mitigation to establish.</i></p> <p><u>To satisfy the requirements of the HRA, there needs to be provision of a detailed site wide recreation and open strategy, which is demonstrated in masterplanning. Provision should be in conformity with policies G12a and Gl6. A full Green Infrastructure Plan for the development should be developed, incorporating open space and a biodiversity management plan.</u></p>
--

Update to associated policy SS10 to reference the site wide recreation and openspace strategy and provisions to satisfy policies G16 and new policy G12a

Established hedgerows should be maintained where they function as wildlife corridors and foraging habitats.

Assumptions

A programme of further studies to be agreed between site promoters and CYC ecologists as part of the ongoing masterplanning process.

Initial ecological evidence referenced has been prepared by Brooks Ecological on behalf of the site promoters and remains valid.

Development will need to be implemented in accordance with a Natural England License to avoid any adverse impacts on potential GCN populations.

Uncertainties

The implementation timescale of mitigation measures and their effectiveness in the long-term are uncertain. The scale and residual effects of development are therefore also uncertain.

It is uncertain whether any mitigation measures will be required to minimise disturbance to bats or to enhance their habitat.

ST9: Land North of Haxby

(Allocation site ref: 823)

NB: Alternative 3 is assumed to come forward only in addition to the allocation or alternative 1. The appraisal reflects this assumption.

SA Objective	Sub-objective (Will the site...?):	Allocation (site 823)		Alternative 1 (site 980)		Alternative 2 (site 814) (additional land)		Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	e/-	?	e/-	?	e	?	<p>Likely Significant Effects</p> <p>There are no nationally or internationally designated sites adjacent to the development. <u>However, Strensall Common is within 2.1km of the site. This distance is within the 5.5km range wherein residents predominantly travel to Strensall Common for recreational use.</u></p> <p><u>The Habitat Regulation Assessment (2020) screens in the potential for adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure resulting from development at ST9. This is as a result of survey data confirming the development would likely result in an uplift of 3% in recreation without mitigation. The lack of an overt mitigation role and criteria to influence the scale and scope of the open space required ensures that prior to any mitigation, there is insufficient confidence to rule out an adverse effect on the integrity of Strensall Common. However, the introduction of suitable and effective policy requirements to ensure the delivery and management in perpetuity of open space, including suitable alternative greenspace to mitigate the possible effects of recreational pressure on Strensall Common, in conjunction with existing Policy Gl6 'New Openspace', would be sufficient to provide, beyond reasonable scientific doubt, the necessary confidence to avoid an adverse effect. This would ensure that development proposals on this site must demonstrate that appropriate amenity requirements for the population of new residents and mitigation requirements for effects on the SAC are evidenced and masterplanned into the scheme in order to satisfy and be in conformity with the associated policy (SS11). Demonstration of this must include suitable alternative greenspace that is natural or semi-natural in form and of sufficient quality to attract new residents in preference to visiting Strensall Common. Associated policy SS11 should be updated to reflect this recommendation.</u></p> <p><u>On the basis that the HRA (2020) screens in the site as having potentially adverse effects, the site without consideration of mitigation scores a significant negative effect. However, there is uncertainty in relating to this given the distance between the site and Strensall Common and the resultant eventual impact. In any event, the policy recommendations to SS11, new policy Gl2a and strengthened links to policy Gl6 should ensure that significant effects are avoided or mitigated.</u></p> <p>Initial ecological investigations by the site promoter for the allocation site (also relevant to alternative 1) identified the following:</p> <ul style="list-style-type: none"> • There is potential for Great Crested Newts due to suitable habitats and ponds. • Mixed native hedgerows and native trees are considered to have greatest ecological benefit. • Unlikely that the grassland is of significant value but vegetation survey s required to confirm this. • There is a parcel of mosaic habitat in the south west corner of the site important to local wildlife. <p>Mitigation suggested by the assessment includes:</p> <ul style="list-style-type: none"> • Surveys for vegetation value, GNCs, bats and water voles are required and potential creation of wetland habitats. • Retention of mature hedgerows and trees. <p>There is potential for the masterplan to use areas identified as having ecological value within the masterplanning of the site. The site will also have to include areas of significant openspace which may help to provide green corridors through the site to benefit biodiversity.</p>

ST9: Land North of Haxby

(Allocation site ref: 823)

NB: Alternative 3 is assumed to come forward only in addition to the allocation or alternative1. The appraisal reflects this assumption.

SA Objective	Sub-objective (Will the site...?):	Allocation (site 823)		Alternative 1 (site 980)		Alternative 2 (site 814) (additional land)	Commentary*
							<p>This includes areas on the identified strategic openspace as well as further provision linked through the site. Provision of this should allow for access to the natural environment for existing and new communities. <u>This provision must also satisfy the mitigation requirements for suitable alternative green space as required by the HRA (2020). In order to demonstrate this, there needs to be a site wide recreation and open space strategy demonstrated in masterplanning that satisfies the provision of recreational openspace (policy G16) and the provisions in the HRA (2020).</u></p> <p>On balance, this site is identified to have a neutral to potential minor impact subject to the identification of suitable mitigation following further assessment. <u>the outcomes of th HRA (2020) has changed the minor negative to a significant negative effect score acknowledging that there is some uncertainty identified and mitigation is suggested to avoid/mitigate significant adverse effects.</u> Alternative 2 may also provide additional benefits but requirements for this site are currently uncertain. <u>Alternative 3 as additional land to the allocation would likely increase potential adverse effects on Strensall Common although mitigation may also be identified.</u></p> <p>Mitigation</p> <ul style="list-style-type: none"> Ecologically-sensitive masterplanning to protect and enhance existing biodiversity value. <u>Provision of a site wide recreation and openspace strategy and its demonstration in site masterplanning.</u> <u>Update to associated policy SS11 to reference the site wide recreation and openspace strategy and provisions to satisfy policies G16 and new policy G12a</u> <p>Assumptions</p> <ul style="list-style-type: none"> Masterplan will seek to strike a balance between housing and biodiversity provision. <p>Uncertainties</p> <ul style="list-style-type: none"> The pressures of market viability on development density and thus opportunities to provide for biodiversity.

ST14: Land to the West of Wigginton Road

SA Objective	Sub-objective (Will the site...?):	Allocation (Site 848)	Alternative 1 (site 949) (Post PPC alternative boundary)	Alternative 2 (site 915) (Developer 1350 homes)	Alternative 3 (site 974) (Developer 1725 homes)	Alternative 4 (site 975) (developer 2250 homes)	Commentary
<p>8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</p>	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	-	?	-	?	-	<p>Likely Significant Effects</p> <p>This site would need to incorporate and consider green infrastructure as set out by policies within the Local Plan, relating to their creation, preservation and enhancement.</p> <p>The site is predominantly arable farmland interspersed hedgerows. Within the boundary of the site there are no statutory nature conservation designations <u>but Strensall Common SAC is within 4.6km of the site. This distance is within the 5.5km range wherein residents predominantly travel to Strensall Common for recreational use.</u></p> <p><u>The Habitat Regulation Assessment (2020) screens in the potential for adverse effects on the integrity of Strensall Common SAC as a result of recreational pressure resulting from development at ST14. This is as a result of survey data confirming the development would likely result in an uplift of 3% in recreation without mitigation. The lack of an overt mitigation role and criteria to influence the scale and scope of the open space required ensures that prior to any mitigation, there is insufficient confidence to rule out an adverse effect on the integrity of Strensall Common. However, the introduction of suitable and effective policy requirements to ensure the delivery and management in perpetuity of open space, including suitable alternative greenspace to mitigate the possible effects of recreational pressure on Strensall Common, in conjunction with existing Policy GI6 'New Openspace', would be sufficient to provide, beyond reasonable scientific doubt, the necessary confidence to avoid an adverse effect. This would ensure that development proposals on this site must demonstrate that appropriate amenity requirements for the population of new residents and mitigation requirements for effects on the SAC are evidenced and masterplanned into the scheme in order to satisfy and be in conformity with the associated policy (SS12). Demonstration of this must include suitable alternative greenspace that is natural or semi-natural in form and of sufficient quality to attract new residents in preference to visiting Strensall Common. Associated policy SS12 should be updated to reflect this recommendation.</u></p> <p><u>On the basis that the HRA (2020) screens in the site as having potentially adverse effects, the site without consideration of mitigation scores a significant negative effect. However, there is uncertainty in relating to this given the distance between the site and Strensall Common and the resultant eventual impact. In any event, the policy recommendations to SS12, new policy GI2a and strengthened links to policy GI6 should ensure that significant effects are avoided or mitigated.</u></p> <p>However, # <u>The site</u> is adjacent to a Site Local Interest (SLI): Clifton Airfield. This is recognised as an SLI due to its interest features of Hawthorn scrub, plantation, rank and moderately species rich grassland. Specifically, there is invertebrate interest and reptile potential on this SLI.</p>

												<p>An Extended Phase 1 Habitat survey completed for an alternative larger boundary has been completed by the site promoters and remains relevant for all of the sites. The survey included land to the west of the site, up to the public footpath that runs from Brecksfields (north) to the A1237 (south), as well as additional land to the east, between the allocation site and the B1363 Wigginton Road where access roads may need to be located. A desk study has also been completed, together a badger survey and winter bird surveys. This has revealed that there are areas of woodland and some buildings which have potential for bat roosting, although bat foraging habitat across the site is considered to be low to medium. There are also a number of identified badger setts within the site. Furthermore there is potential for breeding birds across the site, including barn owls, within the hedges trees, scrub and woodland. A number of ponds have also been identified on or within 250m of the site giving rise to the potential for great crested newts.</p> <p>In order to understand the extent of the ecological interest on the site, further studies are required to ensure appropriate identification and mitigation can be implemented. The ecological interest features currently known are not considered to present a serious constraint to development on the site but should be taken into consideration through masterplanning. Additional protected species surveys by the site promoters are underway, including for breeding birds, barn owls, bats, water voles, otters and invertebrates, in order to fully inform the masterplanning of the site.</p> <p>The site will need to incorporate various types of green infrastructure and open space. Any accessible open space should not compromise the integrity of any biodiversity interests which are identified but may present opportunities for green linkages across the site. <u>This provision must also satisfy the mitigation requirements for suitable alternative green space as required by the HRA (2020). In order to demonstrate this, there needs to be a site wide recreation and open space strategy demonstrated in masterplanning that satisfies the provision of recreational openspace (policy G16) and the provisions in the HRA (2020).</u></p> <p>The site does connect with a local green infrastructure corridor. There is an opportunity to integrate a scheme throughout the site to increase biodiversity and connectivity to the wider natural environment.</p> <p>On balance, the effects of this site are currently unknown as further information is required to determine the required mitigation in relation to ecological interest features, <u>with the exception of likely recreational pressure on Strensall Common SAC. The outcomes of the HRA (2020) has changed the minor negative to a significant negative effect score acknowledging that there is some uncertainty identified and mitigation is suggested to avoid/mitigate significant adverse effects.</u> Given that the site also contains an SLI, a precautionary negative effect is also stated for all of the site boundaries. It should also be acknowledged that the effects of the larger alternatives may have a greater impact as a result of taking a larger area for development <u>and increased recreational pressure on Strensall Common resulting in higher requirements for mitigation.</u></p> <p>Mitigation <i>Ecological studies to be completed to enable further understanding of the sites ecological interest features.</i> <i>Phasing of development should prioritise locations away from any areas identified to have high ecological interest to minimise disturbance and allow any ecological enhancement to establish.</i> <u>Provision of a site wide recreation and openspace strategy and its demonstration in site masterplanning. A full Green Infrastructure Plan for the development should be developed, incorporating open space and a biodiversity management plan.</u> <u>Update to associated policy SS12 to reference the site wide recreation and openspace strategy and provisions to satisfy policies G16 and new policy G12a</u></p> <p>Assumptions</p>
--	--	--	--	--	--	--	--	--	--	--	--	---

												<p><i>Preliminary evidence bases referred to have been prepared by Baker Consultants on behalf of the landowners/developers remain valid.</i></p> <p>Uncertainties</p> <p><i>The results of ecological studies currently under preparation and their requirements for mitigation.</i></p> <p><i>The implementation timescale of mitigation measures and their effectiveness in the long-term are uncertain. The scale and residual effects of development are therefore also uncertain.</i></p>
--	--	--	--	--	--	--	--	--	--	--	--	--

ST15: Land to the West of Elvington Lane

(Site ref: 851)

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

A Objective	Sub-objective (Will the site...?):	Allocation (site 851)		Alternative 1 (site 984) Post PPC	Alternative 2 (Site 979) Developer PPC	Alternative 3 (site 888) Developer	Alternative 4 (site 877/985)	Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ; Protect and enhance locally important nature conservation sites (SINCS); Create new areas or site of bio-diversity / geodiversity value; Improve connectivity of green infrastructure and the natural environment; Provide opportunities for	--	?	-	--	-	--	<p><u>This section includes the changes identified in the SA Report Addendum (April 2018) (underline/strikethrough) and additions/deletions in bold from SA Addendum (2019). New additions/ deletions are added in <i>bold italic</i>.</u></p> <p>Likely Significant Environmental Effects</p> <p>This site would be subject to policies within the Local Plan in relation to Green Infrastructure and Biodiversity relating to creation, preservation and enhancement.</p> <p>The site includes arable farmland interspersed with mixed woodland copses as well as a middle section of Elvington Airfield. In its entirety Elvington Airfield is identified as a Site of Importance for Nature Conservation (SINC) for birds and part of this will be directly lost to development. Two separate sections of the Airfield are designated as SINC for species-rich grassland. These sections are immediately adjacent to the allocation boundary and would be adversely affected by increased access. The site is within 1km of a Site of Special Scientific (SSSI): Heslington Tillmire, and a further SINC: Fulford Golf Course. It is also within 5km of the Lower Derwent Valley (LDV), which is notified as a SSSI, classified as Special Protection Area (SPA), and designated as Special Area of Conversation (SAC) and Ramsar site; parts are also designated as a National Nature Reserve (NNR). Evidence suggests that there is a functional link between the LDV and the allocation as wintering wetland birds from the SPA also utilise land within the allocation for feeding and roosting. These species will therefore be vulnerable to habitat loss from construction and ongoing disturbance from recreational activities. Potential impact from recreation would also adversely affect Heslington Tillmire SSSI.</p> <p><u>Elvington Airfield SINC</u></p> <p>The species-rich grassland SINC areas adjacent to the site boundary would be adversely affected by increased uncontrolled access and others negative impacts associated with housing proximity, and the construction and operation of a new access road to Elvington village.</p>

	<p>people to access the natural environment.</p>											<p>A significant area of the bird SINC will be lost and the remainder fragmented and adversely affected by increased uncontrolled access and others negative impacts associated with housing proximity. Without sufficient mitigation and compensation there will be adverse effects on the existing SINC and overall biodiversity.</p> <p>Although the allocation boundary incorporates part of the airfield and therefore the SINC area designated for birds, it is aligned between the two grassland SINC. Whilst not directly including them in the development it is reasonable to assume that these sites would still experience significant negative effects as a result of development through urban edge effects and recreational pressure unless mitigation was in place to make the sites inaccessible to the public. This would also be likely for alternative 3 and 4 which share the same boundary on to the airfield. Furthermore, in comparison to alternatives 1 and 2, there would be less area that could potentially be left undisturbed to mitigate for the candidate SINC for birds. Although there would be a large area to the west and east of the allocation, a secondary access would need to be provided to Elvington Lane which may cause disturbance in areas outside of the allocation boundary. In addition, the area to the east is reduced in comparison to alternatives 1 and 2.</p> <p>Alternatives 1 and 2 extend the development along the runway taking in more of the SINC to the east. The effects of this are still likely to be significant with the direct loss of SINC habitat but there is an opportunity presented to retain the western half of the runway and the SINC in this area. This may be positive for birds associated with the SINC (and also LDV and SSSI) given the large area that would remain as an undisturbed area, subject to making this inaccessible for recreational purposes to minimise disturbance.</p> <p><u>Heslington Tillmire SSSI</u></p> <p>Heslington Tillmire SSSI is located to the west of the site. The SSSI is notified for its habitats of tall herb fen and marsh grassland as well as wading birds, including lapwing, curlew, redshank and snipe, which live and breed in the marshy grassland. The last assessment by Natural England (2011) found the Tillmire to be in favourable condition. A National Vegetation Classification (NVC) Survey undertaken on behalf of the developer/landowner in 2014 found consistent results with the former and the original SSSI designation interest species.</p> <p>Development of a new garden village within proximity to this SSSI could potentially have significant adverse effects through disturbance to the breeding birds and damage of the grassland as well as changing the hydrological levels which create this habitat. It is acknowledged that Heslington Tillmire already receives disturbance through the use of surrounding footpaths which bound the site and through its designation as Open Access Land available for the public. However, greater disturbance through the close location of a new settlement may have significant adverse effects and is a point applicable to all boundaries appraised.</p> <p>Access to the SSSI is currently available by public footpaths (including the Minster Way linked to Heslington) and via road on Long Lane. The allocation boundary and alternatives 3 and 4 also have an additional right of way extending from Long Lane/Langwith Stray southwards into the site which may be used to link more directly with the SSSI and open access land. Minimising access to Heslington Tillmire SSSI will be paramount in minimising disturbance. Should the development go ahead, access to the SSSI should be restricted without compromising the Open Access Land and Public Rights of Way (PRoW) designations. Suitable Alternative Natural Green Spaces (SANGS) incorporating new networks of attractive footpath routes should be incorporated as part of a site specific Green Infrastructure and Recreation Strategy to divert recreational disturbance pressure away from sensitive sites including the SSSI and</p>
--	--	--	--	--	--	--	--	--	--	--	--	---

											<p>adjacent SINCs. The potential to restrict access to the Open Access land (for 28 days) on the SSSI during the bird breeding season via application to Natural England to help minimise disturbance should be explored.</p> <p>A new population in this location may also have direct consequences on predation of birds in the vicinity. The direct impact on the Tillmire is reduced through the allocation and alternative boundaries being 1km away with the exception of alternative 4 which brings development closer to the SSSI. Predation from domestic cats in particular would have a direct adverse effect on bird populations on site, particularly where they are ground nesting. Sufficient and appropriate buffering/landscaping would need to be in place to ensure that predation is minimised through locating development far enough away from any known area for breeding birds</p> <p>As part of alternative boundary 2, the site promoters proposed an area of enhanced habitat adjacent to Heslington Tillmire in addition to the western end of Elvington airfield, both of which would have no/limited accessibility to the public. This mitigation was based upon their evidence to understand the effects of development and the scale of mitigation necessary to avoid, mitigate and compensate these effects as a result of the development. This mitigation scheme would also be applicable to alternative 1 given the similarity in the boundary. Associated with the allocation boundary is an openspace adjacent to the SSSI which is identified solely for nature conservation associated with ST15. This extends beyond 400m from the SSSI up to the A64 to help mitigate and compensate for effects of development aligning with and extending the site promoter's proposals but excluding additional land on western section of the airfield. This airfield mitigation measure would still be relevant but its implementation is uncertain in connection with the allocation boundary. More mitigation maybe required as a result of alternative 3, given it would bring development closer to the SSSI and for alternative 4 which would increase the scale of the settlement.</p> <p>Advice from Natural England suggests a minimum 400m buffer with deterrents to minimise effects, which accords with the proposed openspace / habitat mitigation areas proposed for the allocation and alternatives 1 and 2. They also recognise the potential significant negative impacts that development in this location may have and whilst they welcome the requirement to avoid impacts on Heslington Tillmire SSSI and secure an area for mitigation, there will also need to be an appropriate site wide recreation and access strategy to minimise indirect disturbance from the development and compliment the mitigation area.</p> <p>The site promoters indicate through submissions for alternative 2, which are also relevant to alternative 1, that masterplanning would include up to 40% of the site areas for openspace and provide "A <i>connected, multi-functional network of green spaces and corridors will be incorporated that permeates the residential areas and forms part of the movement network for pedestrians and cyclists. This network will include public open space, play areas, amenity space, playing pitches, SUDS, wildlife corridors, allotments and orchards, and green movement corridors</i>". These proposals should help to ensure that facilities on-site are attractive for the new population and help to minimise recreational trips to the SSSI in line with Natural England's concerns. Whilst the allocation boundary would be subject to policies in the plan regarding green infrastructure, including openspace provision, the openspace and recreational strategy is currently unknown.</p>
--	--	--	--	--	--	--	--	--	--	--	--

All ecological measures should be established prior to development, particularly in locations near the SSSI, SINC and highly populated bird areas in early phases to ensure that they can sufficiently establish.

Lower Derwent Valley (LDV)

A number of surveys and evidence has been produced on behalf of the developer/landowners to identify and understand the significance of the bird populations as well as whether this would have a consequential negative impact on the Lower Derwent Valley SPA, SSSI and Ramsar site (and Heslington Tillmire SSSI). This evidence is relevant to all site boundaries although it should be noted that there is a gap in evidence in the middle part of the allocation, which is in third party ownership; however, given the proximity and similar (if not identical land-use) it is reasonable to presume that this will support similar biodiversity interest as the adjacent SINC including wetland bird populations from the LDV. This gap in evidence is also relevant for alternatives 3 and 4. In addition, there is a significant evidence gap for alternative 4 given the boundary extends to the north and evidence gap for alternative 3 for the additional land included at Langwith Lakes.

Although the LDV lies some distance away, the Habitat Regulations Assessment Screening Report (2017) has evaluated evidence that suggests there may be a functional link for wetland bird species between the LDV, the site (particularly the airfield and adjacent land) and the adjacent SSSI. Initial advice received from Natural England concurs with this conclusion. The HRA concluded that a likely significant effect could not be ruled out and that an Appropriate Assessment would be required. Specifically, it stated that *“recent ornithological studies have suggested that the site and its environs regularly support considerable numbers of both golden plover and lapwing, both identified as components of the non-breeding bird assemblage of the SPA...with limited information available [representative to this site boundary] ensure that no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required.”* Furthermore, the HRA suggests that this site needs to be informed by ongoing ornithological surveys that evaluate the impact on wintering waders and can be used to identify bespoke mitigation measures. Initial advice received from Natural England concurs with this conclusion.

Ongoing work on the HRA suggests that the successful delivery of this allocation and policy will require the development and implementation of a comprehensive mitigation strategy to ensure that adverse effects on the integrity of the LDV SPA and Ramsar site can be ruled out. This will have to take account of habitat loss through construction and ongoing disturbance from recreational activities, including the provision of Suitable Alternative Natural Green Space and a site-wide recreation and access strategy.

- The revised HRA (2018) further considered that evidence and the potential mitigation required. This states that “Comprehensive requirements for mitigation are already embedded in the existing policy that anticipates the establishment of extensive areas of wet grassland and public open space. Together, these would provide enhanced areas of functionally-linked land for bird populations from the European site and provide alternative countryside recreational opportunities for new residents. Unfortunately, there are insufficient opportunities within SS13/ST15 to deliver all aspects of the built development alongside the measures to provide public open space and ecological mitigation.

- The opportunity to implement these mitigation measures is provided by Policy/Allocation OS10 which is situated immediately adjacent to the west of SS13/ST15. The purpose of OS10 is described as the provision of 'significant areas of open space ... in connection with a strategic site' designed to 'mitigate ... for ecological impacts' and, as a 'New Area for Nature Conservation on land to the South of the A64 in association with ST15'. However, there is no formal policy mechanism in SS13/ST15 that ensures both it and OS10 must be pursued together to secure sustainable development.
- To provide certainty that the embedded mitigation and open space requirements described in Policy SS13/ST15 can be delivered, it is recommended that the Plan is modified to provide a formal link in policy terms with OS10. This will enable delivery of the ecological mitigation whilst public open space can be secured within the footprint of SS13/ST15.
- This can be delivered by deleting the phrase 'as shown on the proposals map' in sub-section (iv) and amending sub-section (vi) to read as follows: 'Incorporation of a new nature conservation area (as shown on the proposals map as allocation OS10 and included within Policy G16 New Open Space Provision)...
- Should this or similar wording be added to Policy SS13/ST15 it is concluded that the Council can ascertain that Policy SS13/ST15 will have no adverse effect on the integrity of the Lower Derwent Valley European site in terms of the disturbance of bird populations. There would be no residual effects and no need for an in combination assessment.."

The updated HRAs (Feb 2019 and October 2020) reconfirms these conclusions. It notes that the changes proposed by the Council in May 2018 (CD003) - which are now proposed modifications - and states: "Therefore, it can be concluded that the adoption of this modification would allow the Council to conclude that an adverse effect could be avoided."

Other ecology

A range of other ecological surveys have been undertaken on behalf of the landowners/developers over the last four years to identify potential constraints and opportunities for alternative site boundary 2. Where appropriate this evidence base remains valid for all sites considered where the boundaries overlap although it should be noted that there are gaps in evidence as outlined above. Surveys have included Phase 1 Habitat Surveys, National Vegetation Survey, and surveys for great crested newts, reptiles and butterflies. Great crested newts were found on adjacent land and notable butterfly species were found on site; no reptiles on site were identified. Appropriate mitigation will be required to ensure the habitats for the identified species are appropriately provided.

The requirement for further species surveys including badgers and bats have been identified.

All biodiversity impacts should be addressed by following the mitigation hierarchy with the overall aim to prevent harm to existing biodiversity assets, delivering no net loss for biodiversity and maximising further benefits.

On balance, the allocation is assessed as likely to have a potentially significant negative effect on this objective. This is based upon the loss of and impact on the Elvington Airfield SINC site and impacts on Heslington Tillmire SSSI. Uncertainty is also identified given site specific mitigation in relation to this site is yet to be fully established.

Notwithstanding this, it is acknowledged that the HRA (2018) concluded that with mitigation ST15 will have no adverse effects on the integrity of the Lower Derwent Valley SPA. **The updated HRAs (Feb 2019 and October 2020) reconfirmed these conclusions.** Similarly, impacts on all of the alternative boundaries are also identified as significantly negative recognising the potential loss of and potential harm to the SINC, SSSI and potentially the Lower Derwent Valley (as their boundaries/quantums have not been subject to HRA). However it should be acknowledged that alternative 1 and 2 may have more positive impacts as a result of the mitigation proposed by the site promoters both adjacent to the SSSI and on the western end of the runway as well as an initial strategy for managing recreation. Alternatives 3 and 4, given the gaps in evidence are identified as having only significant negative effects.

It is also noted that Appropriate Assessment is required as part of the Habitat Regulations Assessment process.

Mitigation

- A minimum of 400m buffer to the SSSI to mitigate predation from domestic animals;
- Appropriate ecological enhancement of the development site to increase its biodiversity and minimise impacts to the SSSI/ LDV through increasing ecological functionality. This should be agreed alongside City of York Council and Natural England.
- Ecological enhancement of the site should be prioritised within the masterplanning/phasing.
- Phasing of development should prioritise locations away from the SSSI to minimise disturbance and allow any ecological enhancement to establish.
- A full Green Infrastructure and Recreational Plan for the development should be developed, incorporating open space and a biodiversity management plan. Any management plans for the site should take into consideration the requirements of the SSSI to maximise synergistic benefits from enhancement and management proposals. Any management proposals will need to be agreed with Natural England.
- Create a policy link in policy SS13/ST35 as set out in the HRA: "deleting the phrase '(as shown on the proposals map)' in sub-section (iv) and amending sub-section (vi) to read as follows: 'Incorporation of a new nature conservation area (as shown on the proposals map as allocation OS10 and included within Policy G16 **New Open Space Provision**). (This proposed change is set out in the proposed modifications to the Publication Draft.)

Assumptions

- The evidence bases referred to have been prepared on behalf of the landowners/developers remain valid. This has involved discussions with CYC ecologists and Natural England. It should be noted that there is a gap in evidence for an area in the mid-west of the site that is in third party ownership.
- Previously suggested mitigation measures are yet to be agreed in relation to this site boundary.

Uncertainties

										<ul style="list-style-type: none">• <u>The implementation timescale of mitigation measures and their effectiveness in the long-term are uncertain. The scale and residual effects of development are therefore also uncertain. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.</u>• <u>There is a gap in evidence for an area in the mid-west of the allocation that is in third party ownership. There are also evidence gaps associated with alternative 3 and 4.</u>
--	--	--	--	--	--	--	--	--	--	--

ST33: Station Yard, Wheldrake

(Site ref: 855)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
<p>8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</p>	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	<p>-</p>	<p>This section includes the changes identified in the SA Report Addendum (April 2018) (underline/strikethrough) and additions/deletions in bold from SA Addendum (2019). New additions/deletions are added in <i>bold italic</i>.</p> <p>Likely Significant <u>Environmental</u> Effects</p> <p>The site does not include any nature conservation designations but is within 1.8km of the Lower Derwent Valley SAC, SPA, Ramsar and River Derwent SAC. The Habitat Regulations Assessment states for this site: <u>The site is within just 2km of the SPA including 'Bank Island', the most important site for breeding birds across the entire European site as well as Wheldrake Ings National Nature Reserve run by the Yorkshire Wildlife Trust.</u></p> <p>The Lower Derwent Valley supports diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond which are vulnerable to disturbance and displacement. In addition, the terrestrial habitats, especially the grassland communities, are all equally vulnerable to disturbance from public pressure which could result in trampling and erosion.</p> <p>Whilst access to much of the SPA is managed and/or restricted (<u>such as to Wheldrake Ings</u>), it is not completely controlled. Furthermore, whilst the majority of functionally-linked land is found on private land, access here can also not be fully managed. Consequently, given the location of certain allocations (eg ST33) within a few kilometres of the SPA, adverse effects cannot be ruled out if recreational pressure is to increase considerably.</p> <p><u>Given that the SPA would be perhaps be one of the most obvious destinations for outdoor recreation, the impact of increased public pressure (frequently allied with dog walking) and predation pressure from cats ensured that LSE alone could not be ruled out in the HRA screening.</u> The HRA screening concludes that given the uncertainty surrounding Policies SS18 (ST33) in particular, there is a risk that the proposals could undermine the conservation objectives for the Lower Derwent Valley SPA and that a likely significant effect cannot be ruled out (alone) and so the policy must be screened in (Category I).</p> <ul style="list-style-type: none"> • <u>However, the HRA (2018) appropriate assessment concludeds "Policy SS18/ST33 already provides some mitigation by ensuring that any new development must accord with principle (iv) to 'undertake a comprehensive evidence based approach in relation to biodiversity to address potential impacts of recreational disturbance on the Lower Derwent Valley Special Protection Area (SPA)/Ramsar/SSSI'. However, this fails to adequately describe a desired outcome and cannot be relied on to provide adequate mitigation.</u> • <u>Given the careful management of recreational pressure at the Lower Derwent Valley including footpaths, hides and wardening, it is considered that a modest revision to section (iv) of the Policy SS18/ST33 by incorporation of the following wording or similar would be sufficient to effectively remove the potential threat and avoid an adverse effect on the integrity of the European site alone.</u> • <u>'This will require the developer to publicise and facilitate the use of other, less sensitive countryside destinations nearby (e.g. Wheldrake Woods) and provide educational material to new homeowners to promote good behaviours when visiting the European site. The former could be supported by enhancing the local footpath network and improving signage.'</u>

ST33: Station Yard, Wheldrake

(Site ref: 855)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<ul style="list-style-type: none"> <p><i>Consequently, if the proposed amendment is adopted it is concluded that the Council can ascertain that Policies SS18/ST33 will have no adverse effect on the integrity of the Lower Derwent Valley European site in terms of the disturbance of bird populations. There would be no residual effects and no need for an in combination assessment."</i></p> <p><u>The site scores as potentially significantly negative against this objective to reflect the site's proximity to the Lower Derwent Valley SPA. Notwithstanding this, it is acknowledged that the HRA (2018) conclusion states that with mitigation there is no adverse effect on the integrity of the SPA. The updated HRAs (Feb 2019 and October 2020) reconfirms this conclusion that the implementation of mitigation within policy (as proposed in the modifications) would allow the Council to conclude that an adverse effect on the integrity of the site could be avoided.</u></p> <p>Mitigation</p> <ul style="list-style-type: none"> <p><i>Comprehensive evidence base is required to determine ecological issues in detail and potential mitigation strategy. <u>Revise section (iv) of policy SS18/ST33 to include the following and remove potential threat of adverse effects on the integrity of the site identified by the HRA: 'This will require the developer to publicise and facilitate the use of other, less sensitive countryside destinations nearby (e.g. Wheldrake Woods) and provide educational material to new homeowners to promote good behaviours when visiting the European site. The former could be supported by enhancing the local footpath network and improving signage.'</u> (This proposed change is set out in the proposed modifications to the Publication Draft.)</i></p> <p>Assumptions</p> <ul style="list-style-type: none"> <p><i>The biodiversity value of brownfield land is less than that of greenfield sites.</i></p> <p>Uncertainties</p> <ul style="list-style-type: none"> <p><i>The type and location as well as mitigation measures are to be determined through masterplanning. This creates uncertainty as to the scale and significance of any effects. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.</i></p>



Part 2 – Alternative Strategic Sites and their boundary alternatives

SITE 148 - LAND AT MOOR LANE, WOODTHORPE (FORMER ST10/SF12)	275
SITE 320 - NEW LANE, HUNTINGTON (FORMER ST11)	289
SITES 723, 872 AND 944 - LAND TO THE WEST OF MANOR HEATH, COPMANTHORPE (FORMER ST12)	300
SITE 131 - LAND AT MOOR LANE, COPMANTHORPE (FORMER ST13)	318
SITE 800 - LAND TO THE SOUTH OF THE DESIGNER OUTLET (FORMER ST25)	329
SITE 779 - LAND TO THE SOUTH OF BROUGHBRIDGE ROAD/A59 (FORMER ST29)	339
SITE: 187 - NORTH OF STOCKTON LANE (FORMER ST30)	350
SITE 170 – POND FIELD, HESLINGTON	363
SITES 297, 874 & 875 – LAND AT RIVERSIDE GARDENS / SITES OFF MAIN STREET, ELVINGTON (FORMER SF10)	375
SITE 789 – LAND TO THE WEST OF BECKSIDE, ELVINGTON	387
SITE 726 – WHEATLANDS, POPPLETON	397
SITE 840 - SOUTH OF DESIGNER OUTLET (ADJ. A19)	408
SITE 859 – NORTH OF ESCRICK	418
SITE 964 : GALTRES GARDEN VILLAGE	428
SITE 220 – WEST OF KNAPTON	443
SITE 629 /861 – THE RETREAT, HESLINGTON	453



© Wood Group UK Limited



SITE REF: 864 – LAND TO THE NORTH OF ELVINGTON INDUSTRIAL ESTATE 465

SITE REF 934 - QUEEN ELIZABETH BARRACKS, STRENSALL

ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
<p>8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</p>	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	<p>--</p>	<p><u>This section includes the changes identified in the SA Report Addendum (April 2018) (underline/ strikethrough) and additions/deletions in bold from SA Addendum (2019). New additions/ deletions are added in <i>bold italic</i>.</u></p> <p>Likely Significant Environmental Effects</p> <p>This site is adjacent to Strensall Common Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which is designated for its lowland heath. Extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands and ponds. Strensall Common also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered e.g. ground nesting birds, invertebrates and aquatic fauna and flora.</p> <p><u>Hydrological regime (<i>wetland habitat</i>)</u></p> <p>The habitats on the SAC are fragile and are vulnerable to changes in the surface and sub-surface hydrological regime, impacts which can be easily prompted by large scale construction nearby. <u>The HRA (2020) screens in a credible risk of ST35 (and associated policy SS19 – proposed to now be deleted) as they could undermine the conservation objectives of the wetland features of Strensall Common SAC and that a likely significant effect could not be ruled out (alone).</u> The previous HRA (April 2018) of the Local Plan referred to a shadow HRA produced on behalf of the site promoter, which considers that mitigation should include using “Sustainable Drainage Systems (SuDS) for the management of surface water, use of silt fencing to trap sediment, and the adoption of best practice measures for pollution management embedded within a Construction Management Plan (CEMP).” The HRA (2018) went on to acknowledge that these and a number of other mitigation measures are embedded in Policy SS19 (now proposed for deletion) that require hydrological and related studies to be completed and used to inform the development effective, deliverable, mitigation measures prior to any consent. The HRA therefore screens out likely significant effects in relation to hydrological regime. The updated HRA (Feb 2019) reconfirms this overall conclusion.</p> <p><u>This issue has been addressed in previous iterations of this HRA (2018 & 2019) and in the (unadopted) HRAs prepared on behalf of the developer in 2017 and 2019. Both were informed by a separate hydrological study that though now over two years old is considered to remain valid. All have concluded that (further to site-specific assessment as part of any future planning application) that none of the three allocations would result in adverse effects on the SAC given the ability to design and employ a range of standard mitigation measures. These would typically include the incorporation of detailed survey of existing surface water drainage, flood risk assessment, and the probable implementation of Sustainable Drainage Systems, use of silt fencing to trap sediment, and the adoption of best practice measures for pollution management embedded within a Construction Environment Management Plan or similar.</u></p>

These views are shared by the HRA (2020), the measures are considered to be reasonable, proportionate, robust, would be implemented prior to either an application or construction and bring with them a high degree of confidence that they will be successful in the long term. The need for these and a number of other mitigation measures are embedded, if not specifically, in Policy SS19/ST35 that require hydrological and related studies to be completed and used to inform the development of effective, deliverable, mitigation measures prior to any consent.

It should be noted here that Amec's HRA was completed before the People Over Wind ruling. Consequently, it is based on the use of mitigation at the screening stage not the appropriate assessment. Whilst mindful of the different tests employed at these two stages, this does not compromise the outcome below because there can be confidence the same results would have been resulted in an appropriate assessment if it had been carried through to that stage at the time.

In terms of SS19/ST35, therefore, the submitted policy wording in May 2018 provides adequate mitigation to provide certainty, beyond reasonable doubt that adverse effects can be ruled out and there would be no residual effects.

Air Quality

Its heathland communities are particularly vulnerable to elevated levels of nitrogen deposition from increased road traffic associated with new development. Current evidence shows that both existing and predicted nitrogen deposition at Strensall Common exceed the minimum critical loads the SAC already exceeds the critical load for nitrogen, prior to assessment of the plan.

Whilst acknowledging this, the Air Quality Assessment undertaken for the plan seeks to understand impacts on nature conservation sites (Annexed to HRA (2018)), in-combination with other development using traffic and air quality modelling. This assessment shows that the nitrogen deposition at Strensall Common with development is above the criteria for ruling out insignificant impacts and is therefore screened in for further assessment. Harmful effects may therefore occur on the vegetation in closest proximity to the road. However, given the modified nature of the vegetation on the road side and that nitrogen deposition is shown to decrease with distance from kerbside, quickly returning to near-background levels, the HRA (April 2018) concludes that it is likely that the plan will slow down the rate of improvement, but not meaningfully increase nitrogen deposition, and is highly unlikely to undermine the conservation objectives of the SAC. It also concludes that there would be no residual effects and no need for an in-combination assessment. **Following reassessment of the evidence, the updated HRA (Feb 2019) concluded that the site will have no adverse effect on the integrity of Strensall Common European site in terms of impacts on air quality emissions. Natural England confirmed their agreement with the conclusions of the HRA (Feb 2019) in an e-mail of 4th June 2019. It stated: "Natural England concurs with the conclusions of this assessment and is satisfied that air quality emissions as a result of the plan will not lead to adverse effects on the integrity of Strensall Common SAC or damage the interest features of Strensall Common SSSI."** The HRA (2020) continues to concur with these conclusions.

Recreational Pressure

The lowland heath is also vulnerable to recreational pressure. Although the common is already well used for a range of activities, further intensification could harm the lowland heath habitat through trampling, erosion, disturbance of stock and nutrient enrichment (dog fouling). In

addition there are birds of conservation concern and other wildlife which are also susceptible to any increase in disturbance. Increased disturbance as a result of recreational behaviour is likely from development adjacent to the Common and may cause significant harm. The reduction and mitigation of such impacts for example through Suitable Alternative Natural Green Spaces (SANGS), active wardening and raising awareness amongst users needs to be given careful consideration and be informed by a comprehensive visitor survey of the Common. An appropriate mechanism to provide sustainable funding for this approach will be required, such as through a levy on the new homes.

Scrub encroachment is a major threat to lowland heath and to manage this Strensall Common is managed under Environmental Stewardship using sheep and cattle grazing by an adjacent tenanted farmer. Interruption to this management regime or factors making it unviable could undermine the conservation objectives for the Common and have a potentially negative effect on the integrity of the site.

The Habitat Regulations Assessment (2018) screening (Report (2017) concluded that as no meaningful mitigation had been proposed within the policy to avoid or mitigate these adverse, that likely significant effects could not be ruled out and that an appropriate assessment would be required to evaluate the impacts from anticipated increases in recreational pressure and road traffic pollution, and construction.

- Subsequent changes to the policy wording has sought to prevent easy, direct access to the Common from the proposed development and provide alternative, natural greenspace to mitigate the adverse consequences of increased recreational pressure (openspace OS12 in policy G16). The effectiveness, or otherwise, of these proposals will be evaluated in the next iteration of the HRA. The revised HRA (April 2018) stated: "The screening exercise concluded that significant effects from recreational pressure on the dry and wet heathland communities at Strensall Common SPA cannot be ruled out alone.

- Comprehensive mitigation is already embedded within Policy SS19/ST35 which provides for extensive open space within the allocation and restricts direct access to the Common for new residents. This is expected to successfully reduce but not prevent the frequency of visits to the Common and so cannot be relied upon entirely to safeguard the European site. Furthermore, no effective measures are proposed that will address the behaviour of visitors (and their dogs) when on the Common. Policies H59 and E18 face no restrictions although their impact is considered to be of a much smaller scale.

- Drawing on experience from other heathlands across England facing similar threats, it is considered that this would be most effectively addressed by the establishment of a permanent, suitably-staffed wardening service that could focus on the management of people to ensure good behaviours are adopted. Whilst the specific wording is a matter for the Council, it is suggested that the addition of text which achieved the following purpose, added to sub-section (ii) of SS19/ST35, would allow this potential threat to be removed:

- 'the introduction of an efficient wardening service that could supplement the work of existing landholders (including the MOD and Yorkshire Wildlife Trust) across the entire Common to present a physical presence on site and encourage good behaviours by the public.'

- This could be supplemented by the addition of the following text to the explanatory text:

'A recreational strategy physical presence on site could promote good behaviours by visitors, encouraging use of existing paths and ensuring dogs are properly controlled. The necessary costs would best be secured by an appropriate levy or similar on each development'.

However, following a letter from Natural England which did not accept these conclusions regarding recreational pressures, visitor surveys of Strensall Common were conducted by the Council in summer 2018. The evidence in the visitor surveys informed further consideration of the LSE of the plan on designated conservation sites, and an Appropriate Assessment, as reported in the updated HRA (Feb 2019). 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.

The unadopted HRA (2019) prepared on behalf of the developers agreed that the site should be screened in as having potentially significant adverse effects. The conclusion of the appropriate assessment however, concluded that with the suggested range of mitigation measures, in addition those considered above, significant adverse effects could be mitigated. This was supported by additional recreational survey evidence.

The HRA (2020) has (re)considered all available evidence in reaching a conclusion. This conclusion concurs with the previous HRA (2019) that significant adverse effects cannot be ruled out (alone). Given the doubts concerning the effectiveness of mitigation measures, the Council is unable to ascertain the absence of an adverse effect on the integrity of Strensall Common SAC. Consequently, in order for significant adverse effects to be avoided, it is recommended that ST35 should be removed as a site allocation in the Local Plan. Additionally, it is recommended that a new policy for Strensall Common SAC (policy GI2a) is included in the plan to ensure that an uplift in recreational behaviour as result of residential development is avoided within 400m of the SAC, that sites allocations within 5.5km must mitigate effects and windfall development within 5.5km is subject to HRA. In reaching this conclusion, the HRA's Appropriate Assessment has considered the following aspects in detail:

- **Analysis and comparison of the 2018 and 2019 survey data:**
 - **In considering the visitor surveys (2018 and developer's 2019 data), both showed similar results and a similar pattern and frequency of visits from residents living nearby. A similar pattern was also observed as to how this decreases with distance.**
 - **Using pooled result from the two visitor surveys, it was identified that 13.4% of a total 23.2% uplift in recreational pressure would result from ST35 with 9.8% from other allocations within 7.5km of the SAC.**
- **Analysis of the effectiveness of mitigation proposed and necessary level of certainty that could be applied:**
 - **All mitigation proposed was considered and evaluated in detail individually and as a package of measures. This included:**
 - **Education/information provision**
 - **Car park barriers**
 - **Wardening**
 - **Managed access**
 - **Information packs to homeowners**
 - **Public open space within ST35**

- Changes to residential layout and boundary treatment
- Additional fencing
- Byelaws
- Alternative green space
- Re-wetting the heath.
- Reasonable doubt as to the effectiveness of mitigation was identified as none of the measures met all the effectiveness tests suggesting that none can be relied upon wholly to meet tests laid out and in case law. Even when considered together, there is reasonable scientific doubt they could deliver the required level of certainty. Therefore, reliance on these would not be consistent with use of the precautionary principle..
- Analysis of the site's conservation objectives objectives for wet and dry heath as well as features on the site such as 'typical species'. For example, the Dark Bordered Beauty Moth at Strensall which is reliant on stands of creeping willow (Salix repens) within the wet heath, although not listed as a qualifying feature, is listed on the SAC citation and the maintenance of its abundance is a target of Natural England's Supplementary Advice (March 2019), which describes it as a 'key structural, influential and/or distinctive species'.

In their letter of 8th October 2020, Natural England endorse the conclusions reached in the HRA (2020, Appendix J)

Other

Within the site itself there are potential areas of ecological interest including protected species (bats, great crested newts, invertebrates) and potential areas of higher value habitat. The Preliminary Ecological Assessment undertaken on behalf of the landowner in March 2017 recommends further work is needed to fully assess the impacts on these biodiversity assets. There is therefore a gap in detailed evidence for these assets to understand implications as a result of development.

There are a good number of well established, high quality trees on site that the development should seek to preserve. At least all trees of category A and B, and any with a significant ecological value should be retained unless they pose an unreasonable restriction on development and their contribution to the public amenity and amenity of the development is very limited, and their loss is outweighed by the benefits and mitigation provided by the development.

Scrub encroachment is a major threat to lowland heath and to manage this Strensall Common is managed under Environmental Stewardship using sheep and cattle grazing by an adjacent tenanted farmer. Interruption to this management regime or factors making it unviable could undermine the conservation objectives for the Common and have a potentially negative effect on the integrity of the site.

In conclusion On balance, this site is scored as having a significant negative impact given the adjacency to the Strensall Common and outstanding issues in relation to ecological interest including protected species. given that **Furthermore, the HRA (Feb 2019) revised HRA (2020) concludes that adverse effects on the integrity of Strensall Common SAC arising from increased recreational pressure and visior disturbance cannot be ruled out. Therefore, it cannot be concluded that the site would not undermine the conservation objectives for Strensall Common SAC.**

Notwithstanding this, it is acknowledged that the HRA (2018) concludes that development is not likely to have adverse effects on the integrity of Strensall Common SAC. further evidence and Appropriate Assessment is required to fully assess the impacts on ecology both within the site boundaries and the neighbouring SAC / SSSI. **The impact of development of this site will be contingent on limiting the significant negative impact on Strensall Common this objective.**

Mitigation

- *HRA states Appropriate Assessment is required*
- *Comprehensive evidence base is required to determine ecological issues in relation to protected species and potential areas of higher value habitat in detail and produce a sufficient mitigation strategy.*
- **To satisfy the HRA, the addition of the following wording to sub-section (ii) of Policy SS19: ‘the introduction of an efficient wardening service that could supplement the work of existing landholders (including the MOD and Yorkshire Wildlife Trust) across the entire Common to present a physical presence on site and encourage good behaviours by the public.’**

Assumptions

- *That development would follow the mitigation hierarchy to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts.*
- *For hydrological impacts the shadow HRA produced on behalf of the site promoter is accurate and remains relevant.*

Uncertainties

The outcome of Appropriate Assessment

- *Alternative designs which avoid impacts and mitigation measures are to be determined through masterplanning. This creates uncertainty as to the scale and significance of any effects. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.*



Appendix D

Updated Appraisal of Spatial Strategy Policies



Appendix D

Updated appraisal of Spatial Strategy Policies

The policy re-appraisal utilises the same matrices and text as the SA Report (2018) Appendix F. Changes were made to the appraisal in light of the first set of proposed modifications, which were subject to appraisal presented in the SA Report (June 2019). Where changes to the SA scoring or appraisal commentary are the same as the 2019 SA Report Addendum these have been identified in underline for additional text or with ~~strikethrough~~ for deleted text. Where the text includes changes to the SA Report Addendum (2019) these will be represented by underline and strikethrough but new amendments are also in **bold**.

Key for assessment

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect
+	The policy is likely to have a positive effect
0	No significant effect / no clear link
?	Uncertain or insufficient information on which to determine effect
-	The policy is likely to have a negative effect
--	The policy is likely to have a significant negative effect

Table F.1 Effects of Spatial Strategy (SS1-12) Policies

*Consideration of the likely significant effects includes short, medium and long-term effects, permanent and temporary effects, positive and negative effects, as appropriate.

SA Objective	Spatial Strategy												Cumulative effect of the draft policies	Commentary on effects of each policy*
	SS1: Delivering Sustainable Growth for York	SS2: The Role of York's Green Belt	SS3: York City Centre	SS4: York Central	SS5: Castle Gateway	SS6: British Sugar/Manor School	SS7: Civil Service Sports Ground	SS8: Land adjacent to Hull Road	SS9: Land East of Metcalfe Lane	SS10: Land North of Monks Cross	SS11: Land North of Haxby	SS12: Land West of Wigginton Road		
1. To meet the diverse housing needs of the population in a sustainable way.	+/-	+	+	+	+	+	+	+	+	+	++	++	++/-	<p>Likely Significant Effects</p> <p>The effects of the majority of the policies on this Objective is predicted to be positive or significantly positive given their role in helping to meet the housing needs for the City. The scale of provision, cumulatively and associated with the strategic sites (SS3-4 and SS6 - SS12), means that a range of housing (including affordable and self/custom build) can be provided to meet specific needs of the City identified in the SHMA.</p> <p>SS1 is considered to have mixed positive and negative effects. SS1 sets out the housing requirement to deliver <u>the assessed economic led housing need of 790 822 dwellings per annum based on the City of York Housing Need Update 2019 prepared for the City of York Council by GL Hearn. The scale of development in SS1 of a minimum of 822 dpa is higher than an OAN plus a 15% uplift for market signals (557dpa). Additionally, SS1 includes the requirement for Gypsies and Travellers and Travelling Showpeople, both those defined by Planning Policy for Travellers Sites and those who fall outside the definition helping, to support delivery against the housing needs of these communities</u> – the baseline housing growth (a minimum of 867 dwellings per annum) over the plan period (2017/18 – 2032/33) and beyond (2032/33 to 2037/38) based on the latest (2016) CLG sub-</p>

														<p>national household growth projections; as set out in the technical work prepared by GL Hearn for the Council in the Strategic Housing Market Assessment update (2017). The scale of development meets the projected baseline growth in the City over the plan period and is considered to be the objectively assessed housing need for York in the explanatory text to Policy SS1. However, it does not reflect fully the upward adjustment made in the SHMA for market signals such as land prices, affordability etc (the SHMA technical work included a 10% upward adjustment is added to make a housing figure of 953dpa).</p> <p>Although minor positive effects related to the policy in relation to achieving this objective have therefore been found, minor negative effects have also been assessed in the longer term as the does not meet housing figure in the SHMA, when adjusted for market signals in line with the Planning Practice Guidance. However, the extent to which negative effects are realised is dependent on delivery of housing above the minimum provision identified in SS1 during the lifetime of the plan. Careful monitoring is required to measure the delivery of housing during the plan period.</p> <p>The scale of proposed development at the strategic sites also means that opportunities for a high degree of self-containment in basic service provision can be secured. Delivery of the policies is a long term aspiration which will cover the plan period and beyond. The cumulative effects of policy implementation will require close monitoring.</p> <p>SS5 has been assessed as having a positive effect as the redevelopment and enhancements to Castle Gateway envisaged will provide environmental and cultural benefits and greater connectivity, helping to support the sustainability of residential areas and attractiveness of the City as a place to live and work.</p> <p>Cumulatively, the policies are therefore considered to have mixed significant positive and minor negative effects.</p> <p>Mitigation</p> <p>As set out in the policies on strategic sites, criteria specifying how the baseline housing need as expressed in the SHMA should be met.</p> <p>Assumptions</p> <p>That housing need across the City will be met through a combination of strategic and local sites, and the proportion of affordable housing reflects local requirements.</p> <p>Uncertainties</p> <p>The rate of housing delivery on strategic sites and the early provision of basic services. Additionally, the delivery above the minimum housing requirement in SS1 which may lessen potential for negative effects in the long term.</p>
--	--	--	--	--	--	--	--	--	--	--	--	--	--	---

<p>2. Improve the health and well-being of York's population.</p>	+	+	+	+	+	+	+	+	+	+	+	+	++	<p>Likely Significant Effects</p> <p>Notwithstanding the complexity of seeking to improve health and well-being, these policies should assist with providing the context for this to happen, through the provision of new high quality housing and mixed use development (SS1 and SS3, SS4 and SS6 - SS12), policies to promote sustainable transport and preventing unacceptable levels of congestion and pollution, including air quality (SS1) and policies for the protection and enhancement of access to open space (formal and informal) at a City-wide scale (through SS2) and in relation to strategic sites (SS3-12) where open space and service provision will accompany housing and other development. <u>Policies SS9-SS12 also specifically include a requirement for detailed site wide recreation and open spaces strategies which will support this objective whilst Policy SS1 will direct development to the most sustainable locations enabling more equitable access to a range of services and facilities (including open/recreational space and community and healthcare facilities).</u></p> <p>Policies SS3, SS4 and SS5 will also contribute positively to the enhancement and revitalisation of the city centre and Castle Gateway, including the public realm and open space improvements.</p> <p>Realisation of provision will be across the Plan period and beyond and cumulatively, the policies should result in significant positive effects if the stated mitigation criteria are adhered to.</p> <p>Mitigation</p> <p>As per criteria set out in strategic site policies SS3-12 along with monitoring of cumulative impacts.</p> <p>Assumptions</p> <p>That new and existing provision will be co-ordinated for the benefit of existing and new residents.</p> <p>Uncertainties</p> <p>The consistency of implementation in respect of service provision, particularly for large strategic sites which are relatively remote from existing provision.</p>
---	---	---	---	---	---	---	---	---	---	---	---	---	----	--

<p>3. Improve education, skills development and training for an effective workforce.</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>++</p>	<p>++</p>	<p>Likely Significant Effects</p> <p>The construction of new homes (SS1 and SS3-12) could create jobs and potentially training opportunities for local people in the construction industry and raise skill levels in this sector. However, any positive effects would depend upon the approach taken by house builders as to whether training opportunities and skills development benefited local people and therefore had any positive effects on this objective.</p> <p>The scale of proposed development is such that there are significant opportunities to secure mixed use development across a number of sites, thereby offering employment opportunities and depending on the new businesses, training opportunities for existing and new residents. The extent and likely character of employment provision will vary significantly by site, with proposals for York City Centre (SS3) and York Central (SS4) for example offering significant mixed use development opportunities for residents in the vicinity and further afield.</p> <p>Policies SS6, SS, SS10 and SS12 explicitly require onsite education provision. They have been assessed as having a significant positive effect on this objective.</p> <p>Mitigation</p> <p>As set out in criteria associated with strategic site policies.</p> <p>Assumptions</p> <p>That implementation of policy will be consistent with other policies on encouraging employment growth and skills development.</p> <p>Uncertainties</p> <p>The extent to which existing residents will benefit from the provision of employment and training opportunities, particularly in the more remote strategic sites.</p>
<p>4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy.</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>++</p>	<p>++</p>	<p>Likely Significant Effects</p> <p>Policy SS1 makes provision for the housing requirement of <u>790 822 dwelling per annum (equivalent to 12,640 13,152 dwellings in the sixteen years between 2017/18 and 2032/33) over 17,340 dwellings (867dpa) and 13,000 jobs (650 per annum) in the plan period between 2012/13 and 2032/2033. It and is considered to have a significant effect on creating and sustaining employment in York and in contributing to the Leeds City Region and the York, North Yorkshire and East Riding LEP Area and delivery of the York Economic Strategy (2016).</u></p> <p>The scale of proposed development, particularly at the strategic sites covered by policies SS3, SS4 and SS6-SS12, offers potential for the development of significant renewable energy-related jobs, both in construction and operation. The construction</p>

														<p>of housing will itself support significant numbers of jobs through the plan period whilst the requirement for enabling self/custom build plots (under H5) will ensure that the sites will support a diverse range of employers.</p> <p>There will also be significant employment opportunities as part of the mixed development within the existing built-up area, within the City Centre (SS3) and York Central (SS4). Policy SS6 will also provide significant employment opportunities to realise the enhancements envisaged.</p> <p>Mitigation None required.</p> <p>Assumptions That implementation of policy will be consistent with other policies on encouraging climate change adaptation and mitigation through a switch to low-carbon energy sources.</p> <p>Uncertainties Market-led delivery and the scale of job creation.</p>
5. Help deliver equality and access to all.	+	+	+	+	+	+	+	+	+	+	++	++	++	<p>Likely Significant Effects</p> <p>The effects of these policies on this Objective is predicted to be positive or significantly positive given their role in helping to meet the objectively assessed housing need for the City.</p> <p>SS1 seeks to conserve and enhance (inter alia) areas with an important recreation function, ensure accessibility to a range of services, and maintain the city centre for main town centre uses. Explicitly directing development to the most sustainable locations will also support equitable access to recreation, community and healthcare facilities. This will help to promote access and equality for all communities within York. SS5 promotes the revitalisation of the Castle Gateway and seeks public realm and accessibility improvements in this key location.</p> <p>The scale of provision, cumulatively and associated with the strategic mixed and housing sites (SS3, SS4 and SS6-SS12) and the proposed broad distribution means that a range of housing and community facilities can be provided (particularly affordable housing) to meet specific needs. The scale of proposed development also means that opportunities for a high degree of self-containment in basic service provision can be secured. Delivery of the policies is a long term aspiration which will cover the plan period and beyond. The cumulative effects of policy implementation will require close monitoring.</p> <p>Mitigation</p>

																<p>As set out in the policies on strategic sites, criteria specifying how housing need and demand as expressed in the SHMA should be met.</p> <p>Assumptions</p> <p>That housing need across the City will be met through a combination of strategic and local sites, and the proportion of affordable housing reflects local requirements.</p> <p>Uncertainties</p> <p>The rate of housing delivery on strategic sites and the early provision of basic services.</p>
<p>6. Reduce the need to travel and deliver a sustainable integrated transport network.</p>	<p>+/ -</p>	<p>0</p>	<p>+ +</p>	<p>+ +</p>	<p>+ +</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/-</p>	<p>+/-</p>	<p>++/-</p>			<p>Likely Significant Effects</p> <p>Growth across the City and through the strategic sites in particular offers opportunities to develop a better integrated transport system for the benefit of residents, workers and visitors. Policy SS1 includes directing development to the most sustainable locations and ensuring accessibility to sustainable transport modes as a key spatial principle, which in conjunction with other policies in the plan (notably T1) would help to reduce the need to travel. However, the provision of some 790 a minimum of 822 homes (equivalent to 12,640 13,152 dwellings in the sixteen years between 2017/18 and 2032/33) 17,600 homes between 2012/13 and 2032/33 for an increase of approximately 24,000 (between 2012 and 2037) 40,000 in the population will lead to an increase the number of private cars within the City. There is the potential for the increase in vehicles to lead to an increase vehicle movements, although whether that will be within the City or the strategic road network that is affected is uncertain.</p> <p>The proposed strategic sites are in some cases set apart from key areas of higher order service provision and as such are likely to generate significant car-base trips, although some degree of self-containment will be secured on the larger sites.</p> <p>By contrast, the redevelopment proposals associated with York City Centre (SS3) and York Central (SS4) offer significant opportunities to provide for the co-location of living, working, shopping and other recreation whilst Castle Gateway (SS6) will (inter alia) deliver cycle and pedestrian improvements.</p> <p>Mitigation</p> <p>As stated in Policies SS3-12.</p> <p>Assumptions</p> <p>As part of strategic site delivery, significant improvements in sustainable transport provision can occur.</p> <p>Uncertainties</p>

															<p>The extent to which City-wide growth, particularly associated with the strategic sites, will lead to greater or less self-containment or further spread unsustainable commuting, for example.</p>
<p>7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.</p>	<p>+/ -</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/-</p>	<p>+/-</p>	<p>Likely Significant Effects</p> <p>The likely effects of these policies are mixed, reflecting increased emissions associated with development but also opportunities for limiting carbon dioxide emissions through energy efficiency measures, renewable energy generation and facilitating sustainable travel. Experience in the City (Derwenthorpe) and around the country suggests that whilst considerable progress is possible, there remains a significant gap to be bridged in to approach carbon neutrality. The full effects of the policies will only be measurable over the longer term and as part of an assessment of the cumulative effects of development as a whole.</p> <p>In a similar way to Objective 5 the effects of SS3-SS5 are considered to be positive, due to the location and mix of development proposed in policies SS3 and SS4, and the sustainable travel enhancements envisaged in SS6.</p> <p>Mitigation</p> <p>As outlined in Policies SS6-13, but could potentially be more radical.</p> <p>Assumptions</p> <p>None.</p> <p>Uncertainties</p> <p>The extent to which potential sustainability measures (e.g. renewable power generation) are realised, particularly on the larger strategic sites.</p>

<p>8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</p>	?	+	+	+	+	+	+	+	+	+	+	+	+	<p>Likely Significant Effects</p> <p>Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of assets), there is a significant opportunity to realise improvements to the City’s green infrastructure network (including open space, biodiversity and geodiversity) through new provision, making links between existing resources and enhancing the management of resources, as well access enhancement generally. Under the guidance of a comprehensive approach to green infrastructure there is potential to enhance assets and access for the benefit of existing and future residents. Long term management of resources will be critical to ensure that improvements are sustainable.</p> <p>Policy SS4 seeks to maximise connectivity in the green infrastructure network. SS6 seeks the maximisation of links to the existing green infrastructure network and delivery of new green infrastructure as part of the Acomb/River Ouse corridor. SS10 seeks an increase in biodiversity and connectivity within the natural environment.</p> <p><u>The Habitats Regulations Assessment (HRA) (2020) considers that the policy wording in SS9-SS12 is adequate to remove the threat of adverse effects on Strensall Common SAC from recreational pressures. Policies SS9-SS12 specifically includes a requirement for detailed site wide recreation and open spaces strategies, in light the HRA (2020) findings, which will ensure the threat of potential adverse effects is removed whilst leading to positive localised outcomes for biodiversity.</u></p> <p><u>The Habitats Regulations Assessment (HRA) preliminary screening screened out the policies in this section for their likely significant effects alone or in combination.</u></p> <p>Mitigation</p> <p>Management of green infrastructure resources to enhance quality and accessibility.</p> <p>Assumptions</p> <p>Protection of statutory and non-statutory biodiversity sites.</p> <p>Uncertainties</p> <p>The extent to which connectivity of green infrastructure assets can be secured and over what timescale, using new development to assist this.</p>
<p>9. Use land resources efficiently and safeguard their quality.</p>	+/-	+	+	+	+	-	-	-	-	-	-	-	+/-	<p>Likely Significant Effects</p> <p>SS1 <u>prioritises making best use of previously developed land seeks the redevelopment of brownfield land to be phased first, where viable and deliverable.</u> However, a significant proportion of new development on strategic housing sites (Policies SS6-SS12) will be located on greenfield land, and as such will</p>

														<p>result in the irreversible loss of this resource. A number of strategic sites e.g. ST14: Land to the West of Wigginton Road and ST4 includes land identified as Grade1-3 Agricultural land.</p> <p>However, the scale of these developments offers significant opportunities for comprehensive masterplanning which would enhance green infrastructure resources. The loss of greenfield land is to some degree balanced by the continued protection and permanence of the Green Belt (SS2) through the plan period and beyond and brownfield regeneration of sites within the existing urban area. The net effect of the policies is therefore judged to have both positive and negative effects.</p> <p>Mitigation</p> <p>Masterplanning of strategic development sites to include significant elements of new and enhanced green infrastructure which help to compensate for greenfield land-take.</p> <p>Assumptions</p> <p>None.</p> <p>Uncertainties</p> <p>None identified.</p>
<p>10. Improve water efficiency and quality.</p>	<p>+/ -</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>Likely Significant Effects</p> <p>An increase in population anticipated by SS1 will have an inevitable negative impact on overall water usage and consumption across the City. This is reflected in Yorkshire Water's Water Resource Management Plan (WRMP19), which identifies a deficit between supply and demand from 2.67Ml/d in 2018/19 increasing to 108.65Ml/d in 2039/40 for the water resource zone in which York is located. <u>However, the final draft WRMP19 (published April 2020) which does not expect a deficit until the mid-2030s for the water resource zone in which York is located due to revised approach to climate change modelling.</u> Please note however that the water resource zone encompasses Leeds, Bradford, Sheffield and Hull.</p> <p>However, the scale of proposed development, particularly at the strategic sites covered by policies SS3, SS4 and SS6-SS12, offers potential for the development of significant sustainable water management initiatives through rainwater recycling, SUDS and water-efficient housing. In addition, Yorkshire Water's WRMP Water Resources Management Plan (both the 2014 and draft 2019 versions) proposes a range of solutions to ultimately meet the forecast supply demand deficit. The options selected include leakage reduction, use of an existing river abstraction licence and a three groundwater schemes.</p> <p>Mitigation</p>

														<p>None required.</p> <p>Assumptions</p> <p>That implementation of policy will be consistent with other policies on encouraging sustainable construction and operation.</p> <p>Uncertainties</p> <p>The extent to which such measures will contribute to the overall sustainability of the housing stock.</p>
11. Reduce waste generation and increase level of reuse and recycling.	+/-	0	+	+	0	+	+	+	+	+	+	+	+/-	<p>Likely Significant Effects</p> <p>The construction and use of the proposed development would inevitably result in an increase in waste generation which could have adverse effects in relation to this objective. However, the scale of proposed development, particularly at the strategic sites covered by policies SS5-10, offers potential for the development of significant sustainable waste management initiatives through re-use and recycling initiatives. As exemplars, practices could be spread across the City over time. In addition, the strategic policies will operate in conjunction with others in the plan, such as policy WM1 which will require the integration of facilities for waste prevention, re-use, recycling, composting, and recovery in association with the planning, construction and occupation of new developments. This requirement would help reduce waste consumption associated with new housing development and to increase levels of reuse and recycling.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>That implementation of policy will be consistent with other policies on encouraging sustainable lifestyles.</p> <p>Uncertainties</p> <p>The extent to which such measures will contribute to the overall sustainability of the lifestyles in the City.</p>

<p>12. Improve air quality.</p>	<p>+/ -</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/ -</p>	<p>+/-</p>	<p>+/-</p>	<p>+/-</p>	<p>Likely Significant Effects</p> <p>The likely effects of these policies are mixed, reflecting increased emissions associated with development but also opportunities for instituting wide-ranging sustainable travel measures.</p> <p>New development covered by the policies in this chapter could have an adverse impact on air quality in York. This could occur during construction of any new development and could be related to dust and particulate matter although such effects will be very localised. In addition as they are subject to a variety of policies in the plan, notably, ENV1 which states that ‘development will only be permitted if the impact on air quality is acceptable and mechanisms are in place to mitigate adverse impacts and reduce further exposure to poor air quality’, it is likely that such effects, if they do occur, will be acceptable. Impacts may also be felt on designated conservation sites, especially from roads in close proximity to these sites. <u>However, Natural England have confirmed their agreement with the air quality assessment set out in the HRA (2018 and reconfirmed in 2019) that there are no adverse effects on integrity of Strensall Common SAC.</u></p> <p>The promotion of walking and cycling suggests that considerable progress is possible, although car use remains relatively high throughout the City. The full effects of the policies will only be measurable over the longer term and as part of an assessment of the cumulative effects of development as a whole.</p> <p>Mitigation</p> <p>As outlined in Policies SS6-13, but could potentially be more radical.</p> <p>Assumptions</p> <p>None.</p> <p>Uncertainties</p> <p>The extent to which potential sustainable travel measures are realised, particularly on the larger strategic sites.</p>
<p>13. Minimise flood risk and reduce the impact of flooding to people and property in York.</p>	<p>+/ ?</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+/ ?</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0/?</p>	<p>Likely Significant Effects</p> <p>Development principles within policy SS1 pay particular attention to flood risk and as such no negative effects are anticipated. However, whilst immediate risk can be reduced, extreme events will occur which place existing and new residents at risk. The extent to which additional development increases this risk is uncertain. Policy SS5 seeks consideration of flood improvement work for Castle Piccadilly and Foss Basin and the Ouse Riverside which may provide minor positive effects against this objective. However, this is uncertain at this stage, dependent on scheme design at application stage.</p>

															<p>Mitigation As per masterplanning proposals for strategic sites, utilising SUDS etc.</p> <p>Assumptions Up to date modelling of flood risk is maintained and influences decision making.</p> <p>Uncertainties Changes in future flood risk from current modelling.</p>
<p>14. Conserve or enhance York's historic environment, cultural heritage, character and setting.</p>	+	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+ +/-	<p>Likely Significant Effects</p> <p>Significant levels of new development will inevitably bring change to the character of the City, particularly where this is associated with strategic sites which envisage substantial tracts of new housing, in addition to the required release of Green Belt land. The re-definition of the City's Green Belt through policy SS2 (notwithstanding removal of land for development) will help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and concentration of development in the urban area, with attendant sustainability benefits. SS1 will also help to manage change and protect the historic environment. This has been assessed as having a significant positive effect on this objective.</p> <p>However, such change can be positive where the creation of new communities helps to address social inclusion and bring service provision and economic prosperity. Effects on the setting of the City can also be managed through land release which does not have a significant visual impact.</p> <p>The HIA identifies a number of negative impacts likely as a result of development at various strategic site locations (notably ST5, ST1, ST2, ST4, ST7, ST8, ST9, ST15, ST14, ST20) but these are addressed through the corresponding strategic policies SS4 to SS13. Policies SS4 to SS12 have therefore been assessed as having positive or negative effects. The implementation of other policies in the plan (placemaking, heritage, design and culture), archaeological mitigation strategies and masterplanning will help mitigation of any negative effects. The presence and extent of negative effects of these policies are to some extent uncertain at this stage.</p> <p>Mitigation As proposed under policies SS4-13 which emphasise the need to respect and where possible enhance local context.</p> <p>Assumptions Masterplanning ensures that new development respects, enhances and creates local character, in particular the City's Green Infrastructure network. Particular attention needs to be paid to the approach taken on sites within or near the City Centre.</p>

															<p>Uncertainties</p> <p>Potential cumulative impacts of development over the longer term.</p>
15. Protect and enhance York's natural and built landscape.	+	+	+	0	+	0	0	-	0	0	0	0	0	++/-	<p>Likely Significant Effects</p> <p>The diversity in scale, type and timing, of development proposals across the City means that there will be significant opportunities to secure new patterns of development which do not detract from and enhance the character of the natural and built landscape of the City. This will demand different approaches according to location. The HIA notes that some change is inevitable from the implementation of these policies although mitigation measures will ensure that to some extent these are managed. For SS8 the HIA notes that the relationship between the southern edge of the built up area of York and the countryside will be changed. Negative effects have therefore been assessed for this policy. The full effects of the policies on this Objective can only be properly judged over the long term.</p> <p>Mitigation</p> <p>Detailed masterplanning to ensure sensitive integration of new development with existing natural and built landscape.</p> <p>Assumptions</p> <p>None.</p> <p>Uncertainties</p> <p>The cumulative impacts of development on the character of the City.</p>



© Wood Group UK Limited





Appendix E

Updated Appraisal of Thematic Local Plan Policies



Appendix E

Updated appraisal of Thematic Local Plan Polices

The policy re-appraisal utilises the same matrices and text as the SA Report (2018) Appendix J. Changes were made to the appraisal in light the first set of proposed modifications, which were subject to appraisal presented in the SA Report (June 2019) Appendix G. Where changes to the SA scoring or appraisal commentary are the same as the 2019 SA Report Addendum these have been identified in underline for additional text or with ~~strikethrough~~ for deleted text. Where the text includes changes to the SA Report Addendum (2019) these will also be represented by underline and strikethrough but new amendments are also in **bold**.

The appendix only sets out where changes in the Proposed Modifications have led to changes in the appraisal so covers policies in the following sections of the Local Plan:

- Housing
- Green Infrastructure

Matrices for the following policy sections are not included in the appendix as the Proposed Modifications have not resulted in any changes to the appraisal previously set out in the SA Report (2018)/SA Report Addendum (June 2019):

- Economy and Retail Policies
- Health and Wellbeing Policies
- Education Policies
- Placemaking, Heritage, Design and Culture Policies
- Climate Change Policies
- Managing Appropriate Development in the Green Belt Policies
- Environmental Quality and Flood Risk Policies
- Waste and Minerals Policies
- Transport and Communications Policies
- Delivery and Monitoring

Key for assessment

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect
+	The policy is likely to have a positive effect
0	No significant effect / no clear link
?	Uncertain or insufficient information on which to determine effect
-	The policy is likely to have a negative effect
--	The policy is likely to have a significant negative effect

Effects of Housing Policies H1-H10

SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies	Commentary on the effects of each policy*
1. To meet the diverse housing needs of the population in a sustainable way.	+	++	++	++	++	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>Implementation of these policies would have significant positive effects on this objective in the short, medium and long term. Although minor negative effects have also been assessed.</p> <p>Policy H1 would help to meet the housing requirement set out in Policy SS1 and complement the minor positive effects in the short, and medium and long term that the provision of a minimum of 822 790 dwellings per annum up to 2032/33 will make. <u>The policy would see the development of a number of housing allocations at strategic and local site level that would contribute to delivery of the housing need identified for the City.</u> However, the policy would also contribute to 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 it does not include an upward adjustment of the baseline for housing market signals (as set out in the Strategic Housing Market Assessment (SHMA) (2017 update) technical work prepared for the</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												<p>Council by GL Hearn). Even with the shortfall for 2012-2017 annualised over the period (56dpa), the 'annual target' is below that identified within the SHMA which in any event would require the shortfall to be applied. However, the presence and extent of the negative effects is dependent on delivery on the ground in the plan period above the housing figure. Careful monitoring is therefore required. The phasing will ensure even delivery across the plan period.</p> <p>Implementation of Policies H2, H3 and H4 will help to ensure that there is a good balance and mix of housing provided as part of new housing developments, which would be particularly important in meeting the diverse housing needs of York. The evidence base identifies an increasingly complex housing market spatially and sectorally which demands policy which can respond positively and flexibly to evolving needs. For example, the York SMHA prepared by GL Hearn (2016), identified the need for 2 and 3 bedroom dwellings across the City, reflecting the demand for family housing and the demand from older persons wishing to downsize but still retain flexible accommodation.</p> <p>Implementation of Policy H4 would support the development of self and custom build homes on all strategic sites and would further help to meet the diverse housing needs of the population. The scale of the provision involved (5% of plots on the strategic sites) mean that this policy, would make an important contribution to the diversity of</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		<p>choice in relation to self and custom build opportunities and have a significant effect on this objective.</p> <p>Policies H5 and H6 would help to meet the needs of the gypsy and traveller, roma and travelling showpeople communities which are an often marginalised group of society and have significant positive effects on this objective. The evidence base shows that there is a shortfall of accommodation for these groups with <u>a need for 3 permanent pitches for Gypsies and Travellers and 3 permanent plots for Showpeople (as defined by 'Planning Policy for Travellers Sites') plus a further 44 pitches for Gypsies and Travellers who do not meet the definition. a need over the duration of the Plan for 47 gypsy and traveller pitches and 3 plots for showpeople.</u> In specifying accommodation provision requirements over the Local Plan period and including policy to guide provision, the approach would help meet this need, in accordance with the Government's 'Planning Policy for Traveller Sites' (2015). H6 also includes an allocation for Travelling Showpeople.</p> <p>Implementation of Policy H7 would help to meet the housing needs of students where there is a proven need. Implementation of Policy H8 would help to control the numbers of houses in multiple occupation in order to control issues of overcrowding.</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing			
2. Improve the health and well-being of York's population.	+	++	++	++	++	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>Implementation of the proposed policies would help to provide good quality housing of a range of types and help towards meeting the diverse housing needs of the population. Living in the right type</p>	

Housing												
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies	Commentary on the effects of each policy*
												<p>and quality of housing would have associated positive health benefits. In particular implementation of Policy H8 would help to control overcrowding, which could otherwise have adverse health impacts.</p> <p>Implementation of policies H5 and H6 would help to improve the health and well-being of the gypsy, traveller, roma and travelling showpeople community by providing dedicated sites for what is often a marginalised section of society. Both policies seek to avoid adverse environmental impacts from development and the incorporation of recreation space and utility services. H6 also specifically seeks to avoid impacts on the amenity of existing residents and future occupiers.</p> <p>In addition, the siting of the new housing sites, seek to ensure that they are sustainable located with options other than private transport available to occupiers and in close proximity to areas of open green space for recreation. Increasing the opportunities to walk and cycle is also associated with improved health benefits.</p> <p>Implementation of policy H10 will help to make housing more affordable and will increase people’s chances of living in a home of their choice. Additionally, H9 will provide accommodation tailored to meet the needs of the ageing population. This would also have associated positive health effects by providing the community with</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing			
3. Improve education, skills development and training for an effective workforce.	0	0	0	0	0	0	0	0	0	0	0	<p>access to a range of good quality housing and would therefore have a significant positive effect on this objective.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p> <p>Likely Significant Effects Implementation of Policies H1 Housing Allocations, H2 Density, H3 Balancing Housing Market, H4 Self Build and H10 Affordable Housing would help to deliver a significant amount of new housing in York which could help to create jobs and potentially training opportunities for local people in the construction industry and raise skill levels in this sector. However, any positive effects would depend upon the approach taken by house builders as to whether training opportunities and skills development benefited local people and therefore had any positive effects on this objective.</p> <p>Mitigation None identified.</p>	

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												Assumptions None identified. Uncertainties There is uncertainty around the extent of any training opportunities that there may be for local people associated with construction jobs for new housing. The extent of any positive effects would depend upon the approach taken by house builders and construction companies towards the development of training opportunities and skills development.
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy.	+	+	+	+	0	0	+	0	+	0	+	Likely Significant Effects Implementation of Policies H1, H2, H3, H4, H9 and H10 would help to deliver a significant amount of new housing in York. This would help to create construction jobs associated with building new housing which would have positive effects on this objective. Policy H1 in particular, as it makes provision for the housing requirement of 822 dwellings per annum up to 2032/33, is considered to have a positive effect on creating and sustaining employment in York, particular for those working or looking to work in the house building and construction sector (which is around 5% of the total employment across the city).

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing			
5. Help deliver equality and access to all.	+	+	+	+	++	++	+	0	++	++	++	<p>Likely Significant Effects</p> <p>Implementation of policies H1-H4 and H7 (Student Housing) would help to deliver a significant amount of new housing across York, which would help people to have greater access to housing and therefore have positive impacts on this objective, with H1 making provision for delivering the housing requirement of a minimum of 822867 dwellings per annum (as set out in SS1). The majority of</p>	

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>allocations included in H1 scored positively or significantly positively for this objective.</p> <p>Implementation of Policies H5 and H6 would have significant positive effects on this objective since they would to enable delivery of dedicated sites for what is often a marginalised group of society and therefore help to deliver equality for the Gypsy, Traveller, Roma and Showpeople Community.</p> <p>Policy H10 would also have significant positive effects upon this objective as it would help to improve access to affordable housing across York by ensuring provision (in perpetuity) and therefore reduce a cause of inequality to the community. H9, meanwhile will support the delivery specialist accommodation to meets specific housing needs over the lifetime of the development. These policies would therefore have significant positive effects in relation to this objective in the short, medium and long term.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing			
6. Reduce the need to travel and deliver a sustainable integrated transport network.	+	-	+	+	+	+	+	+	+	+	+	<p>Likely Significant Effects</p> <p>Depending upon the locations of new housing there could be an increase in traffic generation associated with this housing if such locations are not accessible by sustainable modes of transport, which could have negative effects on this objective. The scale of change proposed within York up to 2032/33 will inevitably generate an increase in the number of vehicles in the city above the existing baseline. There is the potential for the increase in vehicles to lead to an increase in vehicle movements although whether it will be within the City or on the strategic road network is uncertain. In considering these policies, and in particular H1, alongside the requirements of other policies in the plan, notably SS1 and T1 it is the effects upon this objective are considered to have the potential for positive and negative effects. Policy SS1 includes ensuring accessibility to sustainable transport modes is a key guiding principle, whereas Policy T1 would help to reduce the need to travel. In consequence, the policies when considered in conjunction with others in the local plan would have positive effects on this objective. Furthermore, the majority of proposed allocations included in H1 scored positively or significantly positively for this objective.</p> <p>Policy H2 sets out the net densities that housing developments will be expected to achieve and this includes the highest density for the city centre, a requirement for 50 units/ha within the York urban area</p>	

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations		Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	<p>and that support would be given for higher density development within 400m of a high frequency public transport corridor or transport hubs where in compliance with other plan objectives. These requirements, particular for higher density development in urban areas (where there will be existing good public transport links) would help to ensure that new housing can be accessed by sustainable modes of transport and have a positive effect on this objective.</p> <p>Implementation of Policy H4 would support the development of new self and custom build houses on the strategic sites. These strategic sites would need to be developed in accordance with other policies in the plan, including the requirement for travel plans and would therefore need to be accessible by sustainable modes of transport. On this basis development of new build homes on these sites would have positive effects upon this objective. Policy H9 supports specialist accommodation on strategic sites and in accessible locations, thereby supporting achievement of this objective.</p> <p>Policies H5 and H6 include the potential for development of additional gypsy and traveller sites where proposals ensure accessibility to public transport and services and so are considered compatible with this objective.</p>

SA Objective	Housing																Cumulative effect of the draft policies	Commentary on the effects of each policy*	
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing									
																		<p>In particular Policy H7 supports the development of new student housing where it is accessible by sustainable transport modes, which would have positive effects on this objective.</p> <p>Overall it is considered that implementation of policies H2-H10 alongside the transport policies would have positive effects upon this objective in the short, medium and long term.</p> <p>Mitigation None identified.</p> <p>Assumptions It is assumed that there would be a requirement for the provision of access to sustainable modes of transport as part of new large scale housing developments to help deliver a sustainable transport network.</p> <p>Uncertainties None identified.</p>	
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	+	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	<p>Likely Significant Effects Inevitably with the development of new housing there would be an increase in greenhouse gas emissions, associated with the construction activity (combining the effects from the embodied carbon in the construction materials as well as the emissions from construction traffic to and from the site). There could also be an</p>

Housing													
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies	Commentary on the effects of each policy*	
													<p>increase in emissions associated with the energy consumption from the occupation of the new houses. However, Policy CC1 supports renewable and low carbon sources of energy and energy efficiency. Policy CC2 requires that all new development will be expected to consider the principles of sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently. Policy CC2 also requires that dwellings achieve 19% reduction in carbon emissions compared to the Target Emissions Rate. The requirements of these policies would help to ensure that new housing developments are sustainably built, minimise greenhouse gas emissions and to help manage the response to climate change.</p> <p>The construction of the new homes will also lead to some indirect greenhouse gas emissions associated with vehicle movements. Any increase in vehicle movements and/or congestion could have adverse effects in relation to local air quality and the emission of greenhouse gases from vehicle emissions. However, this effect would be mitigated by the commitments on sustainable location, transport statements and Travel Plans.</p> <p>In consequence, whilst the direct effects of emissions from the new development will be considered to be minimal in regard to climate change, the indirect effects of any road travel associated with new development are considered to have a negative effect.</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*	
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing				
														Overall it is considered that there would therefore be neutral and negative effects from the implementation of this objective. Mitigation None identified. Assumptions None identified. Uncertainties None identified.
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Please note the text here replaces the text in the SA Addendum (April 2018) Appendix C. It therefore includes the changes to the SA Report (2018) in underline and strikethrough. Amendments contained within the SA Report Addendum (June 2019) are in bold. New changes to the appraisal have been identified in bold and highlight.</p> <p>Likely Significant Effects New housing developments could have adverse effects in relation to conserving or enhancing green infrastructure, biodiversity,</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>geodiversity, flora and fauna for accessible high quality and connected natural environment if sited in inappropriate locations or without appropriate mitigation. However, other policies in the plan, notably SS1, DP1, DP2, GI1, GI2, GI2a, GI3 and GI6 would help to ensure that the location of any proposed development will seek to conserve and enhance York’s natural environment including internationally, nationally and locally significant nature conservation sites and green corridors.</p> <p>Two<u>One</u> of the proposed general housing allocation sites and <u>three</u> four strategic allocation sites have been identified as being within 250m of Statutory designated nature sites e.g. SPA/SAC/SSSI/LNR and as such have been appraised as having a significant adverse effect. A number of the other sites allocated have been identified as being either within 500m of these statutory sites and/or in some cases within 250m of other sensitive (but not statutory) ecological designations including SINC’s and Areas of Local Nature Conservation. Whilst the full effects can only be considered at the detailed planning application stage, the HRA (2020) <u>identifies that a number of sites could have the potential to increase recreational pressure on Strensall Common SAC and undermine</u></p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p><u>conservation objectives and therefore Appropriate Assessment was undertaken. The HRA states that for the majority of sites adverse effects could be ruled out without the need for mitigation whilst for 4 strategic sites (ST7, ST8, ST9 and ST14) mitigation measures in the form of policy wording would be sufficient to remove the threat of an adverse effect. (February 2019) of the housing policies (at this stage) indicates that it is unlikely to have significant adverse effects upon biodiversity sites of international importance. The HRA (April 2018) could not rule out likely significant effects from site H59 in terms of the recreational pressures on Strensall Common SAC. However, with mitigation identified through Appropriate Assessment (as detailed in the policy) there were found to be no adverse effects on the integrity of the site.</u></p> <p>It is important that development proposals are brought forward in accordance with the Green Infrastructure policies, in particular G12 and G12a to avoid any adverse effects upon feature of biodiversity interest. <u>Cross reference to these policies is therefore welcomed.</u></p> <p>At the planning application stage enhancements may also lead to</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p><u>positive effects on achieving this objective, although overall the effects of the policy are considered to be neutral.</u></p> <p>Policies H5 and H6 seek to safeguard the existing supply of sites for Gypsies, Roma, Travellers and Showpeople and H6 allocates a new site at the Stables, Elvington to meet need. Assuming that this policy is implemented in accordance with other policies in the plan, there would be no adverse effects on this objective.</p> <p>Overall it is considered that effects from the implementation of these policies is neutral.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties There could be enhancements to green infrastructure, biodiversity, geodiversity, flora and fauna as part of new housing developments. However any such benefits could only be determined at the detailed</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*					
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing							
													planning application and so it is uncertain at this stage the extent of any positive effects that there may be.				
9. Use land resources efficiently and safeguard their quality.	+	-	+	+	-	+	-	+	+	+	0	+	-	0	+	-	<p>Likely Significant Effects</p> <p>It has been identified through the detailed site appraisals that approximately 29% of proposed housing sites are on brownfield land. This would help to re-use existing land and therefore mean that approximately one third of the 16,000+ new homes over the plan period will be on brownfield sites. However, a significant amount of greenfield land (approximately 57% of all housing sites) is required for new housing which would score negatively against this objective of using land resources efficiently. The effects of policies H1 Allocations, H3 Balancing Market and H4 self and custom build are considered likely to have both positive and negative effects upon this objective.</p> <p>Implementation of Policy H2 would help to achieve good density for residential developments. This would help to ensure efficient use of land for housing and reduce the amount of new land required for housing. This would therefore have a positive effect upon this objective.</p> <p>Implementation of Policy H5 would help to safeguard the existing supply of Gypsy and Traveller Sites, which would help to ensure efficient use is made of the existing land used for this purpose. The allocation of a new Travelling Showpeople site would help meet the</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												<p>identified need and provide a dedicated site to help avoid unauthorised sites arising elsewhere and help to avoid unnecessary use of other land. There would therefore be positive effects on this objective from this policy.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>
10. Improve water efficiency and quality.	0	0	0	0	0	0	0	0	0	0	0	<p>Likely Significant Effects</p> <p>New housing development would increase demand for water resources overall. However, such effects will be mitigated through use of policies such as CC2 'Sustainable Design and Construction of New Development'.</p> <p>In addition to policies in this Plan Yorkshire Water have produced a Water Resources Management Plan. This sets out how they will ensure supply meets demand for the 25 years from 2015/16 to 2039/40. It incorporates future pressures on water supply and demand due to predicted changes to the climate. It also looks at future changes in population, housing, water use and metering</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>trends in Yorkshire. York is identified as being within the Grid SWZ Water Resource Zone. Yorkshire Water has identified that (taking into account multiple factors including population growth) the Grid SWZ is forecast to be in deficit from 2018/19 onwards. The forecast deficit in 2018/19 is 2.67Ml/d increasing to 108.65Ml/d by 2039/40. Within their WRMP, Yorkshire Water has identified as series of demand management and options to increase supply to meet this forecast deficit.</p> <p>Overall and in consideration of implementation of these policies alongside CC2 and wider measures including the Water Resources Plan highlighted above, and the fact that (as noted below) any improvements to water efficiency / quality can only be fully determined at the detailed planning application stage, overall effects on this objective are considered to be neutral.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties There could be opportunities to improve water efficiency as part of new housing developments, for example with the development of SUDS. However, any such improvements could only be determined</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing			
													at the detailed planning application stage, and so it is uncertain at this stage what positive effects there may be.
11. Reduce waste generation and increase level of reuse and recycling.	+	-	+	+	+	+	+	+	+	+	+	+	<p>Likely Significant Effects</p> <p>The development of new housing would inevitably result in an increase in waste generation which would have adverse effects in relation to this objective. However, policy WM1 requires the integration of facilities for waste prevention, re-use, recycling, composting, and recovery in association with the planning, construction and occupation of new development for housing. This requirement would help reduce waste consumption associated with new housing development and to increase levels of reuse and recycling.</p> <p>For these reasons it is considered that there would be positive and negative effects on this objective associated with the level of growth proposed for York in the short, medium and long term.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												None identified.
12. Improve air quality.	-	-	0	-	-	-	-	0	-	0	-	<p>Likely Significant Effects</p> <p>New housing development covered by the policies in this chapter could have an adverse impact on air quality in York. Two strategic allocations (ST5 and ST36) are within Air Quality Management Areas (AQMAs) and have been assessed significantly negative against this objective. Impacts from these policies could occur during construction of any new development and could be related to dust and particulate matter although such effects will be very localised. In addition as they are subject to a variety of policies in the plan, notably, ENV1 which states that ‘development will only be permitted if the impact on air quality is acceptable and mechanisms are in place to mitigate adverse impacts and prevent further exposure to poor air quality’, it is likely that such effects, if they do occur, will be acceptable.</p> <p>There could also be effects arising from an increase in vehicle use associated with the growth in housing and the associated vehicle emissions, although these effects would be mitigated to some extent by the commitments on sustainable location, transport statements</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												<p>and Travel Plans contained with the transport policies T2 and T8 and also through the requirements of Policy ENV1 on Air Quality.</p> <p>In consequence, the indirect effects of any road travel associated with new housing development are considered to have a minor negative effect (in the case of policies H1, H2, H4, H5, H6, H7 and H9).</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	0	0	0	0	0	0	0	0	0	0	0	<p>Likely Significant Effects</p> <p>New housing development could have adverse effects in relation to flood risk and reducing impacts of flooding to people and property if sited in inappropriate locations or without appropriate mitigation. The following strategic sites – ST5 (York Central PSC boundary), , ST7 (Amalgamate sites to east of Metcalfe Lane), ST 15 (Land to the west of Elvington Lane) and ST32 (Hungate) have all been appraised as having a significant negative effect due to the sites including land identified as Flood Zone 3. However, when considered alongside</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>other policies in the plan, notably Policy ENV4 it is not considered that there would be any overall adverse effects in relation to this objective from this policy.</p> <p>As part of the detailed site appraisal for housing allocations any sites identified in areas of significant risk of flooding (flood zones 2 and 3) have been flagged up as having significant constraints for future development. It will be for the developer to demonstrate to York City Council and the Environment Agency that any flood risk associated with a development proposal will not be at risk from flood events or increase the risk of flooding elsewhere.</p> <p>On this basis it is considered that there would be no overall significant effects from the implementation of these policies on this objective.</p> <p>Mitigation None identified.</p> <p>Assumptions It is assumed that new housing will be located in areas at lowest risk of flooding, or that housing developments would need to accord with policies elsewhere in the plan, notably ENV4, in order to mitigate any adverse effects on flooding.</p> <p>Uncertainties</p>

SA Objective	Housing											Cumulative effect of the draft policies	Commentary on the effects of each policy*	
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing				
													None identified.	
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	+	?	+	0	0	0	0	0	0	+	0	0	+	<p>Likely Significant Effects</p> <p>Implementation of these policies would see the development of a significant amount of new housing across York. New housing development in inappropriate locations or poorly designed could have adverse effects on York's historic environment, cultural heritage, character and setting. However, when considered alongside other policies in the plan including D2, D4, D5, D7 and D10 the development of new housing in accord with these policies would help to conserve York's historic environment through ensuring good design of new housing developments and thereby avoiding adverse effects.</p> <p>The Heritage Impact Assessment (HIA) noted that for H1 there is potential for positive effects on the historic environment although effects are uncertain. The proposed allocations had a mix of scores against this objective.</p> <p>For policy H2 the HIA noted that there is potential for positive effects from supporting higher densities but the effects are largely neutral and dependent on the implementation of the policy. For H3 the HIA noted that as this policy is about provision of different types of housing, the influence on characteristics will therefore depend on design proposals that come forward. Currently, it is considered that</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>the likely impacts are predominantly neutral, however, there is potential for positive effects or harm subject to design.</p> <p>Policies H5 and H6 safeguards the existing supply of Gypsy, Roma, Travellers and Showpeople sites and allocates one new sites to meet need. Provided that these sites are implemented in accordance with the design policies then there should be no adverse effects on York’s historic environment. Furthermore, the policy would only allow other new Gypsy and Traveller sites where proposals do not conflict with the objective of conserving and enhance York’s historic environment and that this includes the city’s character and setting. This requirement would help to conserve York’s historic environment, cultural heritage, character and setting and have positive effects upon this objective. The HIA assessed neutral effects for these policies.</p> <p>For policy H7 the HIA identified that potential harm has been identified for characteristics 3 and 6, Landmark Monuments and Landscape and Setting respectively due to housing development at/near York university campus. The type and scale of these impacts would be dependent upon the type and location of any development. Implementation of other policies in the plan including design/placemaking and green infrastructure would be required to mitigate this.</p>

Housing											
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies
											<p>Commentary on the effects of each policy*</p> <p>For policy H7 on student housing the HIA noted that the policy has a neutral impact on strong urban form by preventing any current impacts from getting worse. The policy has a positive impact on the architectural character of the city as it is conserving existing stock and limiting pressures of new development.</p> <p>The production of heritage statements as part of new housing development would further help to understand the potential effects of new housing development on York’s historic environment and ensure that is at the very least conserved and also enhanced where possible.</p> <p>For the reasons set out above and considered alongside other policies in the plan, in particular implementation of these policies alongside the design policies, it is considered that there would be positive effects in the short, medium and long term on this objective.</p> <p>Mitigation</p> <p>None identified – provided that policies are implemented in accordance with policies on placemaking and design then no other mitigation required to ensure no adverse effects on York’s historic environment.</p> <p>Assumptions</p> <p>None identified.</p>

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
												<p>Uncertainties</p> <p>There could be enhancements to York’s historic environment as part of new housing developments. However any such benefits could only be fully determined at the detailed planning application and so it is uncertain at this stage the extent of any positive effects that there may be.</p>
15. Protect and enhance York’s natural and built landscape.	+	+	0	0	?	?	?	+	0	+	+	<p>Likely Significant Effects</p> <p>Implementation of these policies would see the development of a significant amount of new housing across York. New housing development in inappropriate locations could have adverse effects on York’s natural and built environment. However in considering these policies alongside others in the plan, notably the requirements of Policies D1 and D2, then the development of new housing across York would help to protect and enhance York’s natural and built environment.</p> <p>Policies H5 and H6 set out that new Gypsy and Traveller and Travelling Showpeople sites (other than those already in use) would only be allowed where they would not conflict with the objective of conserving York’s historic and natural and including the City’s character and setting.</p> <p>The HIA notes for H5, H6 and H7 there may be negative effects on the landscape but any effect is dependent on implementation.</p>

Housing												
SA Objective	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing	Cumulative effect of the draft policies	Commentary on the effects of each policy*
												<p>On this basis it is considered that there would be positive effects on this objective in the short, medium and long term. However, there is uncertainty relating to implementation of the policies on the ground.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties The exact extent and specific details of any enhancements to York's natural environment can only be considered at the detailed planning application stage.</p>

<p style="text-align: center;">Housing</p> <p>SA Objective</p> <p>Policy H1 – Housing Allocations</p> <p>Policy H2 – Density of Residential Development</p> <p>Policy H3 – Balancing the Housing Market</p> <p>Policy H4 – Promoting Self and Custom House Building</p> <p>Policy H5 – Gypsy and Travellers</p> <p>Policy H6 – Travelling Showpeople</p> <p>Policy H7 – Student Housing</p> <p>Policy H8 – Houses in Multiple Occupation</p> <p>Policy H9 – Older Persons Specialist Housing</p> <p>Policy H10 – Affordable Housing</p> <p>Cumulative effect of the draft policies</p>	<p>Commentary on the effects of each policy*</p>
<p>Summary</p> <p>Implementation of these policies would have significant positive effects on objectives 1, 2 and 5. These policies would help to deliver a significant amount of new housing over the plan period and would ensure that there is a good mix of different types of housing developed, that such housing is affordable and meets need. Existing supply of sites for Gypsies, Roma, Travellers and Showpeople would be safeguarded and new sites allocated to meet need. All of the various measures in this policy would help to meet the diverse housing needs of York’s population and have significant positive effects on objective. By providing the housing to meet need there is associated significant positive effects on health and well-being and also for access and equality.</p> <p>Positive effects have been identified on objectives 4, 9, 11, 14 and 15.</p> <p>Effects on objective 8 are considered to be neutral although there are a number of the allocated housing sites within 500m and in some cases 250m of sensitive ecological designations. Whilst the full effects can only be considered at the detailed planning application stage, the HRA of the housing policies and strategic sites indicates that they are unlikely to have significant adverse effects upon biodiversity sites of international importance. It is important that development proposals are brought forward in accordance with the Green Infrastructure policies, in particular GI2 and GI2a to avoid any adverse effects upon feature of biodiversity interest. Notwithstanding the requirements of other policies in the plan, effects on this objective can only be fully considered at the detailed planning application stage for new housing sites.</p> <p>One minor negative effect has been identified and this relates to air quality and emission of greenhouse gases. The Local Plan proposes a scale of change within York up to 2030 which will inevitably generate an increase in vehicles and vehicle movements above the existing baseline. Whilst other policies in the plan will help to mitigate effects on air quality from the construction of new houses, the indirect negative effects of an overall increase in vehicle use associated with new housing would have negative effects on objectives 7 and 12.</p> <p>No overall effects have been identified on objectives 3, 10 and 13.</p>	

Effects of Green Infrastructure (GI1-7) Policies

SA Objective	Green Infrastructure									Commentary on the effects of each policy*	
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies		
1. To meet the diverse housing needs of the population in a sustainable way.	+	+	-/?	+	+	+	+	+	+	- / ?	<p>Likely Significant Effects</p> <p>Implementation of policies GI1-6 will support provision for diverse housing needs through helping to provide both an attractive setting for all types of housing and access to natural environments and recreational opportunities for all residents. <u>However, GI2a will not allow a net increase in residential development within 400m of Strensall Common and requires additional mitigation (where required) for proposals for development within 5.5km. This could be expected to have a negative impact on housing delivery within this area. However, this effect is likely to be very minor as it would affect windfall development only and therefore, the presence and extent of any negative effect would also be uncertain.</u></p> <p>Policies GI1 and GI3, in particular, will support access to greenspaces for those living in relatively high density environments and therefore offer opportunities for recreation and health which are important complements to suitable housing.</p> <p>Appropriate provision of new open spaces within new development (Policy GI6) should ensure that there is a consistent approach to the provision of open space resources of various types and hence equal opportunity of access for those in different kinds of housing.</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										<p>GI7 will help ensure suitable provision of burial/memorial grounds in accessible places will help support the growing population in the City of York.</p> <p>Mitigation No mitigation required.</p> <p>Assumptions Assumed that there will be consistent policy implementation, particularly in the provision of open space associated with new development.</p> <p>Uncertainties None. The extent to which windfall development may be limited by GI2a.</p>
2. Improve the health and well-being of York's population.	++	++	++	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>It is expected that policies GI-6 will make a significant contribution to improving the health and well-being of the City's population. Together they establish the basis for the protection, enhancement and provision of open space resources all residents to take advantage of, both actively and passively.</p> <p>Access to natural and semi-natural environments of various kinds, and in reasonable proximity to where people live and work, is a long-proven benefit to human health. These policies will make a fundamental contribution to help realise that potential, particularly where Green Infrastructure resources can be joined together as a functional network and used as a means of helping to promote sustainable transport (see Policy T5 Strategic Cycle and Pedestrian Network).</p>

Green Infrastructure										
SA Objective	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	Commentary on the effects of each policy*
										<p>The policies will play a part in helping to improve City's air quality (Policy ENV1).</p> <p>Policy GI7 will contribute burial and memorial space, which is required within the City area due to the capacity being met in many locations. The support for appropriate development in the locations where they are needed supports wellbeing of the local population.</p> <p>The policies have the potential to make a significant contribution to maintaining and enhancing the image of the City as a pleasant place to live, work and visit, in turn benefitting the City's economy and hence well-being of the population.</p> <p>Mitigation No mitigation required.</p> <p>Assumptions Assumed that there will be consistent policy implementation through securing appropriate funding for provision and that any GI Strategy is able to establish and enhance functional links between various GI resources across the City, complemented by the provision of cycleways, for example.</p> <p>Uncertainties The extent to which trends in car use, for example, can be stemmed and substituted with more sustainable modes of transport.</p>

SA Objective	Green Infrastructure										
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	Commentary on the effects of each policy*	
3. Improve education, skills development and training for an effective workforce.	+	+	+	+	+	0	+	+	+	<p>Likely Significant Effects</p> <p>If realised to its full potential, the establishment of a Green Infrastructure network across the City could provide a range of opportunities for the training in countryside management and tourism opportunities, for example, as a well as the establishment of new businesses. This is an aspiration that would be realised over the medium and longer term and has uncertainty over implementation.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>Assumed that there will be appropriate funding to establish and maintain a functional GI network across the City which could offer increased opportunities in areas such as woodland management.</p> <p>Uncertainties</p> <p>Business Interest in using the GI network as the basis for developing training opportunities.</p>	
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy.	+	+	+	- / ?	+	+	0	+	+	+	<p>Likely Significant Effects</p> <p>Strongly linked to Objective 3, the City's 'green economy' has the potential to take advantage of the policy commitments to realise a functional Green Infrastructure network across the City. Equally, related to Objective 2, the maintenance, enhancement and creation of open spaces of various types across the City is a critical part the City's image and role in attracting new businesses and retaining existing ones. For G12a, a mix of minor positive</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										<p>and negative effects have been identified in recognition that the policy would limit new housing within the zone of influence which may have minor negative effects on housing delivery in the area (and therefore economic benefits related to this). As noted above, this would only affect windfall development, and therefore the magnitude and extent of such negative effects is likely to be very minor and uncertain to some extent. The effects on new employment land itself delivery are considered to be neutral.</p> <p>Mitigation None required.</p> <p>Assumptions Assumed that there will be appropriate funding to establish and maintain a functional GI network across the City.</p> <p>Uncertainties Business Interest in using the GI network as the basis for developing training opportunities.</p>
5. Help deliver equality and access to all.	++	++	++	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>Access to areas of greenspace and other recreational opportunities is a fundamental part of equality of opportunity, particularly for relatively deprived areas and certain groups in society who can become marginalised. In both cases, all the policies are likely to be of benefit over the short, medium and longer term. Equally, access to burial and memorial grounds (as proposed by GI7) supports equality to such facilities across the City area.</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										<p>Mitigation</p> <p>No mitigation required.</p> <p>Assumptions</p> <p>Assumed that there will be consistent policy implementation through securing appropriate funding for provision and that deficits in current provision, where these exist, can be addressed.</p> <p>Uncertainties</p> <p>None</p>
6. Reduce the need to travel and deliver a sustainable integrated transport network.	++	0	<u>0</u>	++	0	++	++	+	++	<p>Likely Significant Effects</p> <p>Related to achieving Objective 5, the provision of a range of accessible open space for all residents will help to minimise the need to travel and encourage a modal shift towards cycling and walking. The policies, by seeking the provision of an integrated network of open spaces, and new provision associated with new development will contribute to achieving the required changes in behaviour. Benefits are likely to be secured over the short, medium and longer term and have the potential to be City-wide, although the contribution of sustainable travel plans could be significant factor in successfully achieving the Objective.</p> <p>Mitigation</p> <p>Ensuing that the content sustainable travel initiatives complement the opportunities provided by the green infrastructure resource.</p> <p>Assumptions</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										<p>None.</p> <p>Uncertainties</p> <p>Implementation of sustainable travel initiatives and synergy with the GI network.</p>
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	++	0	+	++	++	++	++	+	++	<p>Likely Significant Effects</p> <p>Promoting the expansion and enhancement of open spaces has the potential to play a part in reducing greenhouse gas emissions, related to motor transport by encouraging more sustainable travel behaviour. Benefits are likely to be realised over the medium to longer as enhancement of the green infrastructure resource will take time to realise, as well as needing to be complemented by other policy interventions such as sustainable travel plans (see Policy T7 Minimising and Accommodating Generated Trips).</p> <p>Open spaces and trees have a critical role in managing the effects of climate change as well as natural variability in climate, through flood alleviation, the temporary storage of flood water and shading of buildings, for example. It is important that these policies work in concert with partner policies concerning, for example flood risk (the City's rivers have significant floodplains [Flood Zone 3] associated with them) (ENV4), density of residential development (H2) and placemaking and design (D1-14).</p> <p>Mitigation</p> <p>Ensuring that education provision is appropriately supported by and cross-referenced to sustainable design and travel initiatives, environmental quality policies and design policies.</p> <p>Assumptions</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										None. Uncertainties Policy integration to address climate change.
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	++	++	++	++	++	++	++	++	++	Likely Significant Effects These policies are the centrepiece of realising the aspiration of Objective 8 and will if consistently implemented, help to establish a sustainable green infrastructure structure across the City, with attendant benefits on other sustainability objectives (notably 2, 5, 7, 12, 14 and 15). The particular challenge rests in policy implementation and the extent to which, through the commitment to the preparation of Green Infrastructure Strategy for the City, genuine connectivity between various open space resources can be achieved, and consequently the ability to address various agendas including more sustainable travel and equality of access to open spaces. Full implementation of these policies is a long term project for the whole of the plan period and beyond, although short and medium term activity will be important to establish where the most effective long term benefits can be secured. The GI Strategy will be a significant starting point, and development activity, particularly on strategic sites has the potential to make a significant contribution to new and perhaps connecting green infrastructure. Mitigation None identified. Assumptions Longer term aspiration based on short and medium term activity.

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										Uncertainties Consistency and timeframe of policy implementation. The extent which new development can contribute to the City's overall GI network in a coherent fashion.
9. Use land resources efficiently and safeguard their quality.	++	++	++	++	++	++	++	++	++	Likely Significant Effects Safeguarding the quality of the City's green infrastructure resources is an important aspect of resource generally, and these policies will help to realise this objective. In addition, the fundamental linkages between different facets of the land resource are emphasised through these policies, in particular the importance of resource maintenance and enhancement. Mitigation None identified. Assumptions None identified. Uncertainties The relative place of green infrastructure resource in the consideration of development priorities.

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
10. Improve water efficiency and quality.	+	++	+	+	+	+	+	+	+	<p>Likely Significant Effects</p> <p>The policies will make an important contribution to the maintenance and enhancement of water quality by providing natural filtration of run-off, helping to manage runoff patterns and intensity and promoting the efficient working of natural systems. Policy GI2 is assessed as having a significant positive effect on this objective by specifically ensuring water quality is maintained in the River Ouse and River Derwent.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>
11. Reduce waste generation and increase level of reuse and recycling.	0	0	0	0	0	0	0	0	0	<p>Likely Significant Effects</p> <p>No link between this objective and the policies has been identified.</p> <p>Mitigation</p> <p>n/a</p> <p>Assumptions</p> <p>n/a</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										Uncertainties n/a
12. Improve air quality.	++	0	+	++	++	++	++	+	++	Likely Significant Effects Promoting the expansion and enhancement of open spaces and tree cover, particularly in the City Centre and along arterial roads where AQMAs have been designated, has the potential to play an important part in improving air quality across the City, both directly through the dispersal and filtration of particulate matter and indirectly through encouraging more sustainable travel behaviour which will help to reduce vehicle emissions. Benefits are likely to be realised over the medium to longer as enhancement of the green infrastructure resource will take time to realise, as well as needing to be complemented by other policy interventions such as sustainable travel plans (see Policy T7 Minimising and Accommodating Generated Trips). Mitigation None identified. Assumptions None. Uncertainties Implementing sustainable travel initiatives such as through sustainable travel plans and realising a green infrastructure network which presents genuine travel choices.

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	++	++	0	++	0	++	++	+	++	<p>Likely Significant Effects</p> <p>The green infrastructure resource is an important part of the City's flood management regime, through providing areas for water to pond during periods of high rainfall and providing buffer areas between river corridors and residential and commercial properties. The significant floodplains associated with the City's main rivers play an important multifunctional role, providing recreational, biodiversity and landscape benefits. Detailed maps of Green Infrastructure and flood risk across the City are set out in Policy SS1,</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties The nature and extent of climate change and extreme events both of which might require a significantly greater contribution from green infrastructure in helping to mitigate their effects.</p>
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	++	++	+	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>The City's green infrastructure resource is a fundamental part of the historic character of the City, providing both a setting for buildings and being part of that inherent character, such as the Strays and the formal Parks and Gardens. As such, the protection and enhancement of the GI resource through Policies GI1-7 should help to fully realise the SA Objective. There</p>

SA Objective	Green Infrastructure									Commentary on the effects of each policy*
	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	
										<p>are particularly important links between Policy GI4 Trees and Hedgerows and the suite of policies relating to Placemaking and Design (D1-14). The Heritage Impact Appraisal (HIA) notes largely positive impacts on the historic environment from these policies.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties Ensuring long term commitments to resource protection and enhancement.</p>
15. Protect and enhance York's natural and built landscape.	++	++	+	++	++	++	++	++	++	<p>Likely Significant Effects</p> <p>Strongly related to Objectives 8 and 14, the City's green infrastructure is an integral part of securing this Objective, although it can be vulnerable to long term, cumulative change. As such it will be important to ensure that a strategic view is taken on overall development activity and the potential effects of cumulative change. The Heritage Impact Appraisal (HIA) for these policies notes that there are largely positive impacts for the landscape although recognises that there may be harm from the loss of open space (where appropriate under GI5) to other uses. The implementation of other policies in the plan will help mitigate such impacts.</p> <p>Mitigation Assessment of potential cumulative impacts.</p>

Green Infrastructure										
SA Objective	GI1: Green Infrastructure	GI2: Biodiversity and Access to Nature	GI2a: <u>Strensall Common Special Area of Conservation (SAC)</u>	GI3: Green Infrastructure Network	GI4: Trees and hedgerows	GI5: Protection of Open Space and Playing Pitches	GI6: New Open Space Provision	GI7: Burial and Memorial Grounds	Cumulative effect of the draft policies	Commentary on the effects of each policy*
										<p>Assumptions None identified.</p> <p>Uncertainties Extent, character and possible cumulative effects of City-wide development over the plan period.</p>
<p>Summary</p> <p>The appraisal of Green Infrastructure policies has identified significant positive effects across many of the objectives. As such these policies are fundamental to realising the sustainable development aspirations for the City over the short, medium and longer term in creating a greener and better connected City which can respond to the needs and aspirations of the population and help to address the impacts of climate change and its natural variability. Their effective implementation will make an important contribution to the health and well-being of York’s residents and workers, the ecological integrity of the City, air and water quality and management and the character and quality of the natural and built landscape.</p> <p>The policies provide the basis for carrying forward aspirations for more sustainable development across the City, although much rests with implementation. There are short, medium and longer term sustainability gains to be realised through implementation of the policies, appropriately supported by other policies relating to travel plans, for example. The green infrastructure policies have a greater or lesser role to play in realising all the SA Objectives and there are important cross-policy linkages to be made, particularly with regard to environmental quality and protection (ENV1-5 and design and the historic environment (D1-14). Implementation of these policies is complementary with attendant benefits for sustainability.</p> <p><u>Negative effects have also been identified against housing (SA Objective 1 and economy (SA Objective 4). This reflects the impact that the policy would have on new residential development. However, the impacts would be minor in nature, reflecting the relatively small area affected by the policy and the fact that only windfall development would be affected. There is also some uncertainty about the presence and extent of such negative effects.</u></p> <p>Some uncertainties exist in relation to the detail of policy implementation, in particular the degree to which enhancement and extension of the green infrastructure network can be realised, although the commitment to drawing up a Green Infrastructure Strategy should provide the basis for a strategic approach to the resource and locally-specific initiatives to enhance the resource, through increasing connectivity for example.</p>										

wood.

