



City of York Council

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# SUSTAINABILITY APPRAISAL OF CITY OF YORK LOCAL PLAN

Post Adoption Statement





City of York Council

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# **SUSTAINABILITY APPRAISAL OF CITY OF YORK LOCAL PLAN**

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City of York Council

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# SUSTAINABILITY APPRAISAL OF CITY OF YORK LOCAL PLAN

Post Adoption Statement

WSP

Canon Court West  
Abbey Lawn  
Shrewsbury  
SY2 5DE

Phone: +44 1743 342 000

[WSP.com](http://WSP.com)



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## MONITORING FRAMEWORK

# 1 INTRODUCTION

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## 1.1 BACKGROUND

- 1.1.1. The Local Plan for the City of York (hereafter referred to as the Local Plan) was adopted by the City of York Council (the Council) on 27 February 2025. This is the first adopted development plan for York since 1956.
- 1.1.2. Adoption follows the submission of the Local Plan for the City of York: Publication Local Plan (May 2018) (the draft Local Plan)<sup>1</sup> to the Secretary of State for Housing Communities and Local Government<sup>2</sup> on 25th May 2018, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>3</sup>. Subsequently, following Examination in Public (EiP) and a further four rounds of consultation on proposed modifications, including two sets of main modifications to the draft Local Plan<sup>4</sup>, the Local Plan was found sound by the Inspectors in their report dated 14 February 2025.
- 1.1.3. To support the development of the Local Plan, the Council commissioned WSP<sup>5</sup> to undertake a Sustainability Appraisal (SA), incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004<sup>6</sup> (the Strategic Environmental Assessment (SEA) Regulations) which implements the SEA Directive 2001/42/EC. SA ensures that potential environmental effects are given full consideration alongside social and economic issues.
- 1.1.4. This Post Adoption Statement is the final output of the SA process. It describes the way in which the Council has taken environmental and sustainability considerations and the views of consultees into account in the adopted Local Plan and fulfils the plan and programme adoption requirements of the SEA Regulation.

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<sup>1</sup> City of York Council (2018) New Local Plan. Available from: <https://www.york.gov.uk/LocalPlan> [Accessed February 2025].

<sup>2</sup> Now called the Ministry of Housing, Communities & Local Government.

<sup>3</sup> Statutory Instrument 2012 No. 767 The Town and Country Planning (Local Planning) (England) Regulations 2012. Available from [http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi\\_20120767\\_en.pdf](http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf) [Accessed February 2025].

<sup>4</sup> City of York Council (2018) New Local Plan. Available from: <https://www.york.gov.uk/LocalPlan> [Accessed February 2025].

<sup>5</sup> Formally Amec Foster Wheeler Environment and Infrastructure UK Ltd, Wood Environment and Infrastructure UK Ltd and Wood Group UK Ltd. Wood Environment and Infrastructure Solutions UK Limited E&I UK Ltd was acquired by WSP in September 2022. SA support has been provided to the Council under previous company names.

<sup>6</sup> Statutory Instrument 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004. Available from [http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf) [Accessed February 2025] and subject to the amendments in *Statutory Instrument 2018 No. 1232 The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018*. Available from <http://www.legislation.gov.uk/ukxi/2018/1232/introduction/made> [Accessed February 2025].



## 1.2 THE CITY OF YORK LOCAL PLAN

### OVERVIEW OF THE LOCAL PLAN

- 1.2.1. The Local Plan sets out how much new development is to be accommodated in the city to 2032/33 and where this growth will be located. It also contains planning policies and land allocations. To ensure Green Belt permanence beyond the plan period, sufficient land is allocated for development to meet a further, minimum, period of five years beyond the plan period to 2038. It has been developed considering national planning policy<sup>7</sup> and guidance<sup>8</sup>, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement.
- 1.2.2. The Local Plan includes the following key parts:
- Vision and Development Principles;
  - the Spatial Strategy in terms of the quantum and distribution of growth;
  - strategic sites;
  - smaller scale (local) land allocations; and
  - plan policies.
- 1.2.3. Overall, the Local Plan identifies sufficient land to accommodate the delivery of at least 13,152 dwellings (a minimum net provision of 822 new dwellings per year) to meet the Council's Objectively Assessed Housing Need across the period 2014 to 2033 (with an additional housing land supply buffer of 10% for site flexibility) and sufficient land to accommodate an annual provision of around 650 new jobs that will support sustainable economic growth. The spatial strategy focuses this growth on the main urban area of York and in new free-standing settlements with some urban and village extensions.

## 1.3 PREPARATION OF THE LOCAL PLAN

- 1.3.1. The Council has prepared the Local Plan over a number of years. The development of the Local Plan reflects work which began in 2005 when the Council commenced the preparation of its Local Development Framework (LDF) Core Strategy. Following the publication of the National Planning Policy Framework (NPPF) in March 2012 and the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan) in 2013, the Core Strategy was withdrawn from the examination

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<sup>7</sup> 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 February 2025]. A revised Framework was published in July 2018 and further revised in February 2019, July 2021, December 2023, and December 2024. Transitional arrangements are included in paragraph 220 of the July 2021 Framework. This indicates that, for the purpose of examining the York Local Plan, the policies in the 2012 Framework apply as the draft Local Plan was submitted prior to 2019.

<sup>8</sup> MHCLG (2024) Planning Practice Guidance. Available online: <https://www.gov.uk/government/collections/planning-practice-guidance> [Accessed February 2025]

process on 3rd August 2012, following a Full Council meeting on 12th July 2012, in order to produce a Local Plan compliant with new national planning policy.

- 1.3.2. In 2013 the Council published the Local Plan Preferred Options, which set out the preferred approach to development in the City of York area. Following further refinement, a Publication Draft Local Plan was prepared by Council officers and reported to the Local Plan Working Group (LPWG) and Executive in September 2014. A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken. Following further technical work related to housing and employment growth, the Preferred Sites Consultation was published in 2016. This was revised in light of sub-national housing projections, which affected the underlying baseline evidence in relation to housing need, and sites being brought forward for release by the Ministry of Defence in 2016 leading to the consultation on the Local Pre-Publication Plan in 2017.
- 1.3.3. Taking into account representations received during consultation on the Pre-Publication Draft Local Plan (2017), new evidence, and the recommendations of its accompanying SA, the Council prepared the Publication Local Plan (the draft Local Plan) and made this available for representations between 21 February and 4 April 2018. Following the close of consultation, the Council submitted the draft Local Plan to the government on 25th May 2018 for independent examination (known as the Examination in Public or EiP). Hearing sessions were held over five phases in December 2019, May, July, September 2022 and March 2024.
- 1.3.4. Four further public consultations were carried out during the EiP process concerning proposed modifications to the draft Local Plan, including two consultations on main modifications:
- Local Plan proposed modifications consultation from 10 June to 22 July 2019;
  - Local Plan Proposed Modifications and Evidence Base Consultation from 25 May to 7 July 2021;
  - Local Plan Proposed Main Modifications Consultation from 13 February to 27 March 2023; and
  - Local Plan Proposed Main Modifications Consultation for Policy H5 from 18 July to 3 September 2024.
- 1.3.5. The EiP documents can be found here: <https://www.york.gov.uk/planning-policy/new-local-plan-examination>.
- 1.3.6. The Local Plan was found sound by the Inspectors in their report<sup>9</sup> dated 14 February 2025. It has been subsequently adopted by the Council on 27 February 2025.

## 1.4 SUSTAINABILITY APPRAISAL

### OVERVIEW

- 1.4.1. Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this

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<sup>9</sup> The Planning Inspectorate (2025) Report to City of York on the Examination of the City of York Local Plan Council by Simon Berkeley BA MA MRTPI and Paul Griffiths BSc (Hons) BArch IHBC. Available online: <https://www.york.gov.uk/downloads/file/10084/inspectors-report> [Accessed February 2025.]

requirement, local planning authorities must also incorporate the requirements of the SEA Regulations.

- 1.4.2. 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.
- 1.4.3. At paragraphs 150 and 151, the NPPF (2012)<sup>10</sup> 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 development<sup>11</sup>. In this context, paragraph 165 of the NPPF (2012)<sup>12</sup> 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.”*
- 1.4.4. The Planning Practice Guidance (PPG) also makes clear<sup>13</sup> 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 2024)<sup>14</sup>, taking into account the reasonable alternatives, and based on proportionate evidence.
- 1.4.5. In this context, SA has been an integral part of the preparation of the Local Plan for York. SA of the Local Plan helps to ensure that the likely social, economic and environmental effects of the Plan are identified, described and appraised. Where negative effects are identified, measures have been proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures have been considered that could enhance such effects.
- 1.4.6. The SA work undertaken in support of the Local Plan can be viewed on the Council’s website: <https://www.york.gov.uk/LocalPlanExaminationLibrary>.

## 1.5 PURPOSE OF THE POST ADOPTION STATEMENT

- 1.5.1. This Post Adoption Statement represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:
- how environmental and sustainability considerations have been integrated into the Local Plan (Section 2 of this document);

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<sup>10</sup> Paragraph 16 of the NPPF (2024) sets out that local plans must be prepared with the objective of contributing to the achievement of sustainable development.

<sup>11</sup> 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).

<sup>12</sup> The requirement for SA/SEA for local plan preparation is set out at paragraph 33 of the NPPF (2024).

<sup>13</sup> MHCLG (2024) Planning Practice Guidance, Plan-making paragraph 037, Reference ID 61-037-20190315 (Revision date: 15/03/2019)

<sup>14</sup> As noted above the NPPF (2012) applied to the examination of the draft Local Plan under transitional arrangements. Reference is made to the NPPF (2024) for context only.



- how the SA Reports have been taken into account (Section 3);
- how opinions expressed in response to the consultation on the draft Local Plan and SA Reports have been taken into account (Section 4);
- the reasons for choosing the Local Plan, as adopted, in the light of the other reasonable alternatives dealt with (Section 5); and
- the measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Local Plan (Section 6).

## 2 HOW ENVIRONMENTAL AND SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE LOCAL PLAN

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### 2.1 ENVIRONMENTAL AND SUSTAINABILITY CONSIDERATIONS IN THE LOCAL PLAN

#### PREPARATION OF THE LOCAL PLAN

- 2.1.1. Environmental and wider sustainability considerations have been integral to the key decisions made by the Council in respect of the policies and proposals of the Local Plan. The integration of these considerations into the plan making process has principally been achieved through:
- the development of a comprehensive evidence base on topics including (inter alia) housing, the economy and employment, renewable and low carbon energy, open space and recreational facilities, transport, landscape, Green Belt, biodiversity and green infrastructure, flood risk, climate change and water;
  - continuous engagement with key stakeholders and the public on the emerging Local Plan and related environmental and sustainability matters;
  - the consideration of national planning policy and the objectives of other plans and programmes at the national, regional and local level;
  - fulfilment of the Council's Duty to Cooperate; and
  - ongoing assessment including SA (see Section 2.2) as well as Habitats Regulations Assessment (HRA)<sup>15</sup>.

#### LOCAL PLAN CONTENT

- 2.1.2. In accordance with Section 39 of the Planning and Compulsory Purchase Act 2004 and paragraph 7 of the NPPF, the objective of contributing to the achievement of sustainable development underpins the Local Plan. This aim is expressed in the Local Plan vision, which seeks to maintain the special qualities and distinctiveness of York, whilst also delivering sustainable economic growth and the city's economic, social and environmental objectives and outcomes. For example, one of the desired outcomes of the Local Plan is to 'Create a Prosperous City for All', which requires the creation of housing and employment opportunities that follow the principles of sustainable development.

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<sup>15</sup> Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended, including through EU exit legislation) (known as the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network (now National Site Network) of protected sites 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. The process by which the impacts of a plan or programme are assessed against the conservation objectives of a European site is known as 'Habitats Regulations Assessment' (HRA).

- 2.1.3. The policies and proposals of the Local Plan will support the delivery of the vision and outcomes and help to deliver sustainable development. For example, the Spatial Strategy policies (Chapter 3 of the Local Plan) provide an overarching framework for the promotion of sustainable growth and support an appropriate scale and distribution of housing and employment over the Plan period (Policy SS1).
- 2.1.4. In this context, the City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report 2018 (Publication Draft SA Report (2018))<sup>16</sup> accompanying the draft Local Plan concluded that development and growth associated with the Local Plan would deliver socio-economic benefits associated with the delivery of housing and employment in the City over the plan period and the strong framework provided by the plan policies will help to conserve the City's natural and built environment and resources. The Publication Draft SA Report (2018) notes that whilst development will result in some adverse environmental effects (such as increased pressure on natural resources and the generation of waste), it is expected that those policies of the Local Plan which seek to conserve and enhance the City's natural and built environment and protect its resources, will help to minimise such impacts. The exception is the anticipated loss of greenfield land associated with new development which the Publication Draft SA Report (2018) concludes as having a significant negative effect on land resources.

## 2.2 ENVIRONMENTAL AND SUSTAINABILITY CONSIDERATIONS IN THE SA

- 2.2.1. To provide the context for the SA, and in compliance with the SEA Regulations, a review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment and its evolution without the Local Plan were considered; together, they informed the identification of a series of key sustainability issues. This information was initially set out in the 2013 Local Plan Sustainability Appraisal: Scoping Report.(Scoping Report)<sup>17</sup> and was subsequently updated throughout the subsequent iterations of the SA, including the Publication Draft SA Report (2018), in order to ensure that all contextual information continued to be appropriate, and the resulting appraisal framework robust.
- 2.2.2. The key sustainability issues identified through the review of plans and programmes and analysis of baseline information informed, and were reflected in, the objectives and guide questions that comprised the framework used to appraise the Local Plan (the SA Framework) (see **Table 2-1**). Broadly, the SA objectives presented the preferred sustainability outcome which usually involved minimising detrimental effects and enhancing positive effects.

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<sup>16</sup> Amec Foster Wheeler and City of York Council (February 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report

<sup>17</sup> City of York Council (2013) Local Plan Sustainability Appraisal: Scoping Report.

**Table 2-1 - SA Framework**

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

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



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

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
	<ul style="list-style-type: none"> <li>Promote high quality design in context with its urban and rural landscape and in line with the “landscape and Setting” within the Heritage Topic Paper</li> </ul>	

2.2.3. The SA process has considered the contribution of the Local Plan towards each of the appraisal objectives, drawing on the baseline information to predict the likely significant effects. Specifically, the following key components of the Local Plan have been appraised against the SA objectives:

- Local Plan vision and outcomes;
- Development Principles;
- Housing and employment land targets (the amount of growth to be accommodated in the city over the plan period);
- the Spatial Strategy (where, in broad terms, growth should be located in the city);
- Strategic land allocations;
- local, non-strategic land allocations; and
- Local Plan policies.

2.2.4. The appraisal identified the likely changes to the baseline conditions as a result of the Local Plan’s implementation. These effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. Secondary, synergistic and cumulative effects were also considered.

## 3 HOW THE SA REPORT HAS BEEN TAKEN INTO ACCOUNT

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### 3.1 OVERVIEW

3.1.1. The development of the Local Plan has been iterative, with SA (along with the wider evidence base) playing an integral role in each of the stages of the Local Plan's development. The findings of the SA were documented in SA Reports in order to help inform the plan and fully integrate environmental and wider sustainability considerations into the Council's decision making. These stages were as follows (report dates in brackets):

- Local Plan Preferred Options Sustainability Appraisal (June 2013);
- City of York Local Plan Preferred Sites Consultation Interim Sustainability Appraisal (July 2016);
- City of York Local Plan: Pre-Publication Draft (Regulation 18 Consultation) Sustainability Appraisal Report (September 2017);
- 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);
- City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (May 2021);
- City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum – Proposed Modifications Consultation (January 2023); and
- City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum - Consultation on Proposed Modifications to Policy H5 'Gypsies and Travellers' (July 2024).

### 3.2 HOW THE FINDINGS OF THE SA HAVE BEEN TAKEN INTO ACCOUNT

3.2.1. The SA has helped to shape the strategic direction of the Local Plan. In particular, the findings of the SA of the emerging Local Plan, and reasonable alternatives, informed the Council's decisions in respect of:

- the quantum of housing and employment growth to be accommodated in the city over the plan period;
- the overall distribution of that growth across the city (the Spatial Strategy);
- the sites to be allocated in the Local Plan and their configuration to deliver the overall quantum of growth based on the preferred Spatial Strategy.

3.2.2. **Table 3-1** identifies the key stages and the key conclusions of the SA that helped to inform development of the draft Local Plan. Further information regarding the strategic options considered in preparing the Local Plan and appraised as part of the SA process is provided in **Section 5**.

**Table 3-1 - Local Plan Stages and SA Reports**

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
Local Plan Preferred Options (2013)	<p>The SA Report included an appraisal of:</p> <ul style="list-style-type: none"> <li>• Drivers (housing and employment).</li> <li>• Four options to shape growth.</li> <li>• Two options for the Role of the Green Belt to determine its primary purpose. A further two options were also considered relating to ensuring a permanent Green Belt through identifying development safeguarded sites.</li> <li>• 24 strategic sites.</li> <li>• Four options for housing growth ranging from 850 – 2060. Preferred option – 1090.</li> <li>• Two employment growth options.</li> </ul>	<p><b>Spatial Strategy – Drivers and shapers</b></p> <p>Broadly the assessment identified that those options which comprise the preferred spatial strategy would have a positive effect across many of the SA objectives but with positive effects being significant in relation to economy, equality and accessibility, biodiversity, land use, cultural heritage and landscape.</p> <p>The options which comprise the preferred spatial strategy would help to define the role and economic priorities of the York Sub Area and the spatial distribution of development is expected to meet overall housing and employment land requirements for the City. This spatial approach may improve the viability and vitality of the City Centre. Overall, none of the reasonable alternatives assessed as part of the SA were considered to perform better, in sustainability terms, than the preferred options that comprise the proposed spatial strategy.</p> <p><b>Spatial Strategy – Approach to Green Belt</b></p> <p>Options 1 (preserve the setting and special character of York) and 2 (give equal weight to all Green Belt purposes identified in NPPF) were assessed as both having predominantly significant positive or minor positive effects. However, Option 1 scored better in terms of objectives 14 (heritage) and 15 (landscape) reflecting the specific purpose of this option to preserve the historic character and setting of York. Option 2 was identified as having a minor positive for these objectives given that specific emphasis was not placed upon preserving these characteristics. In addition, option 1 was appraised as having a minor negative effect on objectives 1 (housing) and 4 (employment) given that it could potentially limit the extent of land available to accommodate growth. The Preferred Approach (Option 1) therefore was appraised to perform better than the reasonable alternatives.</p> <p>Out of the two alternatives relating to ensuring a permanent Green Belt, Option 4 would safeguard a range of sites in the Green Belt that may be required to meet longer term development needs (i.e. beyond the plan period) including for housing and employment. Relative to Option 3, this option had the potential to provide a greater degree of flexibility in respect of site choice in the future and, by extension, the ability of Plan reviews to respond to changes in the socio-economic and environmental baseline whilst helping to ensure that the Green Belt endures beyond the plan period. In consequence, the option was assessed as having positive effects across the majority of SA objectives.</p> <p><b>Strategic sites</b></p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>A range of effects were assessed. All of the sites which include housing contribute to meeting SA Objective 1. Overall, the cumulative effects of the development of a wide range of sites are likely to be beneficial for health (SA Objective 2). It is likely that the cumulative effects of the distribution of proposed employment (SA Objective 4) sites would be positive. The proposed level of development, particularly on greenfield sites and in the urban fringe, would have a significant effect on the City of York. (SA Objective 14 and 15).</p> <p><b>Housing Growth options</b></p> <p>The preferred approach was assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing. The preferred option was not assessed as having any significant negative effects. The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including health, climate change, water, waste and resource use and air quality. These negative effects could be reduced through mitigation measures/Local Plan policies and directing housing to locations which reduce the need to travel and avoid locations which could exacerbate existing health issues e.g. AQMAs.</p> <p>The SA Report concluded that on balance the preferred approach was considered to perform better, in sustainability terms, than the reasonable alternatives. Higher levels of growth may further enhance positive effects on socio-economic SA objectives.</p> <p><b>Employment Growth</b></p> <p>The SA identified that the preferred approach would have a positive effect on several SA objectives with positive significant effects in relation to education and the economy. The preferred option would deliver an estimated 16,169 jobs over the plan period facilitating faster growth in advanced manufacturing, science and research, financial and professional services and tourism and leisure sectors. Allied with other elements of the approach, including the protection of existing employment land and providing criteria to facilitate growth in health and social care sectors, this was expected to support the York fulfilling its role as a key economic driver.</p> <p>The preferred approach was not assessed as having any significant negative effects on any of the SA objectives. However, the assessment did conclude that economic growth could have minor negative effects on objectives relating to climate change, water, waste and resource use and air quality.</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>Overall, those options which comprised the preferred approach were considered to perform better, in sustainability terms, than the reasonable alternatives. In particular this reflected the reduced scale of economic growth envisaged under the baseline scenario. It was recommended that the preferred approach included adequate environmental safeguards to protect the environment from any adverse impacts associated with growth in the healthcare and social care sectors.</p>
<p>City of York Local Plan Preferred Sites Consultation (2016)</p>	<p>The SA Report included an appraisal of:</p> <ul style="list-style-type: none"> <li>Site selection process and methodology</li> </ul>	<p>The SA identified a variety of positive and negative impacts across a number of objectives.</p>
<p>City of York Local Plan: Pre-Publication Draft (Regulation 18 Consultation) (2017)</p>	<p>The SA Report included an appraisal of:</p> <ul style="list-style-type: none"> <li>A comprehensive spatial strategy was set out, covering the drivers of growth and factors that shape growth in the city, alongside the scale of growth and the key areas of change and opportunity that would support the delivery of the strategy (including policies on the city centre, York Central, Castle Gateway and strategic sites).</li> <li>the preferred housing option (867 dpa) and the reasonable alternative (953 dpa)</li> <li>three employment growth options</li> </ul>	<p>Overall, the policies in the spatial strategy were appraised as having a significant positive effect on those SA objectives relating to housing (SA Objective 1), health (2), economy (4) and equality and accessibility (5).</p> <p>Minor positive effects were expected against education, climate change (7), biodiversity (8), water, waste, cultural heritage (14) and landscape (15).</p> <p>The sites proposed in the Pre-Publication Draft were appraised against the SA objectives in light of the updated evidence base. The sites were considered to result in a number of positive and negative effects across the range of SA objectives.</p> <p><b>Housing Growth Options</b></p> <p>The SA appraised the preferred option (867 dpa) and the reasonable alternative (953 dpa) based on the technical work undertaken by GL Hearn which saw an uplift in the baseline projections to account for market signals.</p> <p>The preferred option was appraised as having positive effects on housing (SA Objective 1) in the short and medium term but minor negative effects in the long term; and minor positive effects on education (3), economy (4) and access to services (5). Minor negative effects were assessed against health (2), climate change (7), biodiversity (8), land resources (9), water (10), waste (11), air quality (12), flood risk (13), historic environment (14) and landscape (15). Although uncertainties were identified for many of these.</p> <p>The SHMA 2017 Update reasonable alternative was considered to be marginally more sustainable due to the significant positive effects for housing (SA Objective 1), economy (SA Objective 4) and access to services (SA Objective 5) in the long term and similar effects for other SA Objectives.</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p><b>Employment Growth Options</b></p> <p>Polices SS1 (setting the overall employment growth requirement) and EC1 (which set out the specific allocations) were appraised as having significant positive effects on the economy (SA Objective 4).</p> <p>The preferred option for employment growth was appraised as Option 2 (Re-profile Sector Growth) is considered to perform better, in sustainability terms, than either the Baseline Scenario or Option 1, reflecting in particular the significant positive effects identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3) and economic growth (4) which was considered most complementary to the economic priorities of the Council.</p> <p>Policy EC1: made provision for a range of employment development during the plan period including the identification of around 140,000m<sup>2</sup> of employment floorspace to meet the forecast demand.</p>
<p>City of York Local Plan: Publication Draft (2018)</p>	<p>The SA Report included an appraisal of:</p> <ul style="list-style-type: none"> <li>• the compatibility of the emerging Local Plan vision and outcomes with the SA objectives</li> <li>• Key Development Principles</li> <li>• three housing target options (867 dpa, 953 dpa, 1,070 dpa)</li> <li>• three employment growth options including a baseline scenario and two employment land review (ELR) growth options</li> <li>• Spatial strategy policies</li> <li>• 21 strategic site allocations and reasonable alternative options.</li> <li>• 29 local sites and reasonable alternative options</li> <li>• Thematic policies</li> </ul>	<p><b>Housing Land Target Options</b></p> <p>The range and type of effects associated with the three housing target options (including the 867 dpa preferred option) were assessed as being similar with positive effects identified in respect of housing and the economy, with option 3 having greater benefits but also greater disbenefits due to the amount of housing it proposed compared to the other two options.</p> <p>Option 2 (a housing target of 953 dwellings per year) was identified as the marginally best performing option when considered against the SA objectives.</p> <p><b>Employment Land Review Growth Options</b></p> <p>The preferred employment growth option (ELR Option 2) (650 jobs per annum between 2017 and 2038, around 13,650 over the period) was assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3).</p> <p>Negative effects were identified with regard to climate change (Objective 7), land resources (Objective 9), water (Objective 10) and waste and resource use (Objective 11). This primarily reflects the use of resources required to support economic growth and the generation of waste, both during construction and once new commercial development is operational. Further negative effects were identified in respect of cultural heritage (Objective 14), and landscape (Objective 15) due to the potential pressure</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>that is likely to be placed on the City’s environmental assets by economic growth.</p> <p>No significant positive effects were identified for the other two options. The baseline scenario (alternative) scenario was assessed as having no significant positive or negative effects against any of the SA objectives. The ELR Option 1 (alternative) was assessed as having significant positive effects against employment (Objective 4) in both the medium and long term. Significant negative effects were identified for ELR Option 1 in response to land use (Objective 9). This assessment was predicated on the basis that the scale of development proposed under the ELR Option 1 and the focus upon growth within the wholesale and retail sector has the potential to result in the need to accommodate new development on greenfield sites.</p> <p>On balance, the Preferred Option (ELR Option 2) was considered to perform better, in sustainability terms, than either of the alternatives, reflecting in particular the significant positive effects identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3) and on creating jobs and deliver growth of a sustainable, low carbon and inclusive economy (Objective 4) which is considered most complementary to the economic priorities of the Council.</p> <p><b>Spatial Strategy Policies</b></p> <p>The draft Local Plan policies were assessed as having positive effects across all of the SA objectives with significant positive effects identified in respect of: health, education and skills, economy, equality and accessibility.</p> <p>Where negative effects were identified, the SA Report concluded that those Local Plan policies which seek to conserve and enhance the city’s natural and built environment and protect its resources will help to minimise adverse effects.</p> <p><b>Strategic Site Options.</b></p> <p>Together, the strategic sites would deliver a substantial proportion of the city’s housing requirement and employment land over the plan period alongside community facilities and services including educational facilities. A mixture of significant positive effects were therefore identified for various sites in respect of SA objectives relating to housing, the economy, education, transport, equality and accessibility.</p> <p>The majority of sites were assessed as having a minor negative effect on biodiversity, with five sites potentially having significant negative effects due to habitat loss. Most of the sites were identified as having a significant negative effect on land use, though four sites were</p>



Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>identified as creating significant positive effects due to developing purely previously developed land.</p> <p>All sites were identified as having minor negative effects against the SA objectives for water quality and waste due to any development increasing water consumption in the long term and would result in the greater generation of waste.</p> <p>Most of the sites were identified as having minor negative effects in terms of their effects on air quality, though three sites that could affect the AQMAs within York are identified as having significant effects because of this.</p> <p>Most of the sites scored neutrally against the SA objective for flood risk as they are not in locations at risk of flooding. Four sites do score a minor negative for being at risk of some flooding, with two sites scoring a significant negative effect due to being located adjacent to local rivers (River Ouse and River Foss).</p> <p>Due to the high number of historical assets within York and its surroundings, and how important they are to the landscape, character and setting of the area, a wide range of effects were identified against cultural heritage (Objective 14), and landscape (Objective 15) for the sites. Most sites were identified as having a minor negative effect against both SA objectives, with potential benefits identified for sites that were developing previously developed land (replacing rundown development with newer, better designed development). However, ST32, which is a brownfield site, was identified as potentially having significant negative effects due to its potential impacts upon the Core Conservation Area. It is assumed that the negative effects identified for all of the sites could be minimised or mitigated through the implementation of the draft Local Plan’s planning policies.</p> <p><b>Local Sites</b></p> <p>The SA Report concluded that, overall, the scale of housing and employment land to be delivered through smaller scale (local) allocations will help to meet the future needs of the City, its communities and businesses over the plan period whilst minimising the potential for significant adverse environmental effects.</p> <p>Whilst there is the potential for new development to result in adverse environmental effects (and in some cases, significant negative effects), the SA Report found that the potential adverse effects could be mitigated at the project level, in accordance with the Local Plan policies.</p> <p>A considerable number of previously developed sites were identified; however, cumulatively development will result in the loss of a substantial area of greenfield land which includes best and most versatile agricultural land. In</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>consequence, the potential for significant positive and negative effects on land use was identified. Significant negative effects against the other SA objectives for the local sites are rare and mainly associated with sites close to local rivers (flood risk issues) or close to local important sites for biodiversity (biodiversity issues).</p> <p><b>Thematic Policies</b></p> <p>Due to their nature, a wide range of effects were identified for the Thematic Policies, though no significant negative effects were identified, and the identification of minor negative effects are rare.</p> <p>The overall effect of these policies is therefore a mixture of significant positives or positive effects, though some uncertainties are identified.</p>
<p>City of York Local Plan Publication Draft – Schedule of Minor Modifications to 25th May 2018</p>	<p>The SA Report included an appraisal of:</p> <p>Proposed wording updates to strategic site policies and thematic policies</p> <p>Relevant strategic sites</p>	<p>The proposed minor changes to policies and strategic sites resulting from evidence in the HRA (April 2018) were screened for SA. Where it was considered likely that there could be significant effects as a result of the changes, the minor changes were reappraised.</p> <p>Following completion of the SA, no further significant effects were identified. The reappraisal of Spatial Strategy policy SS13 led to a change against SA Objective 8 (biodiversity) with a minor negative effect being identified. This was due to the removal of uncertainty regarding its effects following the updated HRA information. Policy SS18 was also changed to have a mixture of minor positive and minor negative effects against SA Objective 8 (biodiversity).</p> <p>The only other scoring change was regarding policy EC1, which was appraised a having a neutral effect against SA Objective 8 (biodiversity).</p>
<p>City of York Local Plan Proposed Modifications Consultation (June 2019)</p>	<p>The SA Report included an appraisal of:</p> <p>Proposed modifications to strategic and thematic local plan policies</p> <p>Relevant changes to strategic sites and local sites reflecting HRA updates and Green Belt evidence</p> <p>Four housing growth options (790dpa, 867dpa, 953dpa, 1,070dpa)</p>	<p>The June 2019 Proposed Modifications resulted from an update to the housing need underpinning the draft Local Plan, an updated HRA, and further clarity provided on defining the City's Green Belt. Key and significant changes are identified below:</p> <p>A new preferred housing growth figure of 790 dwellings per annum (dpa) was identified and assessed alongside a re-assessment of the alternative figures (867dpa, 953dpa and 1,070dpa). The preferred figure of 790 dpa represented the full economic led objectively assessed need (OAN) and was found to have positive effects across a number of objectives relating to housing, education, employment.</p> <p>The reasonable alternatives (867 dpa, 953 dpa, and 1,070 dpa) were found to have the same effects as identified in the Publication Draft stage SA Report (2018) with the</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>exception of the 867 dpa figure against the housing objective. Due to the updated OAN evidence, the appraisal found positive effects for the Publication Draft alternative figure in the long term. In the Publication Draft SA Report (2018) it was found to have minor negative as it did not meet the housing need figure identified in the evidence at the time (SHMA 2017 Update).</p> <p>Regarding the deletion of site ST35 and site H59 due to the updated HRA, some minor scoring changes were identified for the policies with scores changing to minor positives or neutral. No changes were recorded for the appraisal of site E18 having 'significant negative' effects on SA Objective 8 (biodiversity) (as a function of the site appraisal scoring system) which could be mitigated through policy, as the conclusions of the HRA (Feb 2019) reconfirmed those in the previous HRA (April 2018)</p> <p>The proposed modifications to the Green Belt boundary were considered to have no implications for the SA.</p>
<p>City of York Local Plan</p> <p>Composite Modifications Schedule</p> <p>(April 2021)</p>	<p>The SA Report included an appraisal of:</p> <p>Proposed modifications to strategic and thematic local plan policies</p> <p>Proposed changes to Green Belt boundaries</p> <p>Proposed change to housing requirement (822dpa) and an additional option of 1,026dpa.</p>	<p>The April 2021 modifications resulted in a change to the housing requirement of the draft Local Plan (822dpa), though this increase in housing did not change any of the scoring within the SA.</p> <p>A number of wording changes were proposed to the Spatial Strategy policies, with the corresponding SA text being updated to reflect this new wording, though no scoring change occurred.</p> <p>The updated 2020 HRA resulted in the change in scoring for some of the Strategic Sites (ST7, ST8, ST9 and ST14) due to the potential to affect the Strensall Common SAC, with the revised appraisal identifying a significant negative against SA Objective 8 (biodiversity). SA commentary was updated to further reflect the 2020 HRA, though no other scoring was amended. Following HRA Appropriate Assessment, it was concluded that the effects on Strensall Common SAC could be mitigated through implementation of mitigation in policies within the Local Plan Publication Draft (as proposed to be modified). This was reflected in an update to the appraisal commentary against SA Objective 8 for site specific spatial strategy policies SS9-SS12.</p> <p>A new policy was proposed (Policy GI2a: Strensall Common Special Area of Conservation (SAC)). The proposed changes reflected the evidence in the HRA (2020) regarding the potential recreation pressures on Strensall Common SAC and would 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 appraised against health (SA Objective 2), access for all (SA Objective 5),</p>

Local Plan Document	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
		<p>biodiversity (SA Objective 8) and land uses (SA Objective 9). However, negative effects were identified 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 was uncertain. This 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.</p> <p>Two changes in the appraisal of overall effects of the (modified) Publication Draft on the SA objectives were 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.</p>
<p>Local Plan Proposed Main Modifications Consultation February 2023</p>	<p>The SA Report included an appraisal of:</p> <p>Proposed Main Modifications, Additional Modifications and Policy Map Modifications.</p>	<p>The February 2023 Main Modifications resulted in no change or very minor changes to the scoring for the Development Principles, housing requirement, Spatial Strategy policies, Strategic Sites and thematic policies previously identified. No further changes were identified for any cumulative effects.</p> <p>In terms of the changes to Local Sites:</p> <ul style="list-style-type: none"> <li>• three sites were deleted as they had now been completed (in addition to one housing site deletion outlined above (H59));</li> <li>• one employment site was deleted (E8);</li> <li>• a site for a secondary school was also appraised and included in the emerging plan (ST15a).</li> <li>• four new potential housing sites were received at the Local Plan Publication Draft stage, one of which was an amendment to the boundary of a previously assessed site, were also appraised. None were included in the emerging plan.</li> </ul> <p>All changes were appraised in the SA Report.</p>
<p>Local Plan Main Modification Consultation July 2024</p>	<p>The SA Report included an appraisal of:</p> <p>Proposed Main Modifications to policy H5 Gypsies and Travellers.</p>	<p>The July 2024 Main Modifications SA reviewed the proposed amendments to policy H5 Gypsies and Travellers and its potential effects. Whilst the main modifications resulted in the amendment to the number of Gypsy and Traveller pitches to be provided and the need for the new requirements for masterplans to be approved for Local Authority sites prior to development of further pitches, no further changes to the SA were made.</p>

3.2.3. Through the development of the Local Plan, a number of recommendations were made concerning the emerging Local Plan policies. Appendix K of the Publication Draft SA Report (2018) includes a

policy trail audit which reflects the development of the policy, taking into account the findings and recommendations of the SA, national policy changes and representations.

- 3.2.4. A recommendation was also included in the Publication Plan SA Report (2018) that suggested that the Council review the housing requirement in the draft Local Plan in light of any revisions to the Government's housing need assessment methodology and publication of new national policy following consultation. Through the EiP (as confirmed in the main modifications) the Council amended the housing requirement in the plan aligning it with up-to-date evidence prepared in accordance with the PPG under the NPPF (2012), as applied through the transitional arrangements. The final housing requirement in the adopted Local Plan took into account the later 2016 based population projection data which saw a lower increase in York's projected population over the plan period than the previous 2014 based projections that underpinned the previous Objectively Assessed Need (OAN) calculations for York. Therefore, the Council acted on the recommendation of the SA, even though this was driven by emerging evidence base.
- 3.2.5. Three further policy enhancement measures were also identified in the Publication Draft SA Report (2018). The recommendations related to Policy EC4 and Policy EC5, in relation to including cross references to other policies on placemaking, heritage, design and culture; and to Policy WM1, in relation to including references to enhancing the natural environment and taking account of flood risk considerations in the policy. However, these suggestions were not taken forward by the Council prior to adoption of the Local Plan as it was considered that specific cross references to other policies in the plan were not required in Policy EC4 and Policy EC5 given that policies elsewhere in the Local Plan (specifically Policy D1 to Policy D13, where relevant) would be taken into account when any applications for tourism or rural economy development are considered. With regards to Policy WM1, it was considered that other Local Plan policies covering the natural environment (such as Policy GI2) and flood risk (Policy ENV4) provided sufficient policy coverage that would be applied to consideration of any waste facility proposals.

## 4 HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

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### 4.1 CONSULTATION ON THE LOCAL PLAN

- 4.1.1. The development of the Local Plan has been informed by extensive, ongoing engagement and public consultation, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. These have reflected the stages of plan preparation:
- Local Plan Preferred Options (June 2013), whose consultation ran from 5 June to 31 July 2013;
  - City of York Local Plan Preferred Sites (July 2016), whose consultation ran from 18 July to 12 September 2016;
  - City of York Local Plan: Pre-Publication Draft (Regulation 18 Consultation) (September 2017), whose consultation ran from 18 September and 30 October 2017; and
  - City of York Local Plan: Publication Draft (February 2018), whose consultation ran from 21 February until 4 April 2018.
- 4.1.2. The draft Local Plan (together with supporting information including assessments and evidence base studies) was submitted to the government (Secretary of State for Housing, Communities and Local Government<sup>18</sup>) on 25th May 2018. On submission of the Local Plan to the Secretary of State, the Council published a Consultation Statement<sup>19</sup> which set out the consultation undertaken during the preparation and publication of the Local Plan, a summary of the main issues raised and details of how the comments received have been taken into account.
- 4.1.3. The government appointed two planning inspectors to conduct an independent examination (EiP) into the Local Plan. Hearing sessions were held over five phases in December 2019, May, July, September 2022 and March 2024. During the EiP a series of consultations were undertaken reflecting the changing evidence and outcomes of hearings, with a series of proposed changes to the Local Plan identified at each stage. Consultation on the four sets of proposed modifications to the draft Local Plan were undertaken between:
- 10 June and 22 July 2019 on a series of proposed modifications related to housing need and Green Belt;
  - 25 May and 7 July 2021 on a series of proposed modifications related to housing need, updated HRA evidence and Green Belt;
  - 13 February and 27 March 2023 related to main modifications across the plan; and
  - 18 July and 30 August 2024 on main modifications related to Policy H5.
- 4.1.4. Consultation summaries were prepared and included in addenda to the Council's Consultation Statement (Regulation 22) and the representations received considered by the Inspectors.

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<sup>18</sup> Now Ministry of Housing, Communities & Local Government

<sup>19</sup> City of York Council (2018) City of York Local Plan – Consultation Statement. Available from: <https://www.york.gov.uk/downloads/file/3403/cd013a-city-of-york-local-plan-consultation-statement-regulation-22-may-2018-> [Accessed February 2025].

## 4.2 CONSULTATION ON THE SA

- 4.2.1. Following consultation on the scope of the SA Scoping Report in 2013, SA Reports have been prepared and published for consultation at each key Local Plan stage, as follows:
- Local Plan Preferred Options Sustainability Appraisal (June 2013);
  - City of York Local Plan Preferred Sites Consultation Interim Sustainability Appraisal (July 2016)
  - City of York Local Plan: Pre-Publication Draft (Regulation 18 Consultation) Sustainability Appraisal Report (September 2017)
  - 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);
  - City of York Local Plan: Publication Draft - Sustainability Appraisal Report Addendum (May 2021);
  - City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum – Proposed Modifications Consultation (January 2023); and
  - City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report Addendum - Consultation on Proposed Modifications to Policy H5 'Gypsies and Travellers' (July 2024)
- 4.2.2. The Scoping Report was subject to a 6-week consultation period in May 2013. Overall, three responses were received to the consultation (two from the statutory SEA consultation bodies (English Heritage, now Historic England, Natural England) and one from North Yorkshire County Council. Responses related to all aspects of the Scoping Report and resulted in amendments to the SA Framework. Appendix B of the SA Report 2018 contains a schedule of the consultation responses received to the Scoping Report, the Council's response and the subsequent action taken and reflected in subsequent SA Reports.
- 4.2.3. The options concerning the quantum and distribution of growth that were identified in the Preferred Options (2013) document, Preferred Sites Consultation (2016) and Local Plan Pre-Publication Draft (2017), and emerging policy provisions, were assessed using the revised SA Framework with the findings presented in SA Reports that were issued for consultation alongside the Local Plan document.
- 4.2.4. At the Preferred Options (2013) stage, a total of 12 responses were received to the consultation on the Preferred Options SA Report (2013). The responses raised concerns with the SA assessment of flood risk matters, the importance of Green Belt, and heritage impacts of strategic sites. A total of 10 responses were received related to the 2016 Sustainability Appraisal Interim SA Report which accompanied the Preferred Sites Consultation (2016). Responses from Historic England predominantly related to the findings of the assessments of strategic sites (at that stage). Two of the sites highlighted as having concerns were subsequently not taken forward in the draft Local Plan. Responses from site promoters raised that an appraisal of all reasonable alternatives to the preferred strategic sites was not explicitly included in the interim report. This was addressed in the subsequent SA Report accompanying the Pre-Publication Draft in 2017 and Publication Plan Draft SA Report (2018).

- 4.2.5. At the pre-publication draft stage in 2017, 27 responses were received to the Pre-Publication Draft SA Report (2017). Responses were received from SEA consultation bodies, site promoters and other interested parties. Responses from Historic England predominantly related to the assessment of the strategic sites against the SA Objective related to the historic environment (SA Objective 14) whilst they also queried available alternatives to the identification of ST15: Land West of Elvington Lane. Others queried the selection and rejection of site alternatives outlined in the Pre-Publication Draft SA Report (2017), with some site promoters seeking the inclusion of their sites in the draft Local Plan. The assessment of policy SS13 in the Publication Draft SA Report (2018), which set out policy for developing site allocation ST15: Land West of Elvington Lane, was revised to take into account Natural England comments related to the HRA. The SA appraisal of this policy was then subsequently further revised in SA Report addenda reflecting the consultation outcomes and HRA. The summary of responses received, and actions taken in response, for the above consultations is set out in Appendix B of the Publication Draft SA Report (2018).
- 4.2.6. The Publication Draft SA Report (2018) was issued for consultation alongside the Local Plan Publication Draft (Regulation 19 Consultation). The Council prepared a Consultation Statement (Regulation 22) summarising the resultant representations, including responses to the SA, as part of its submission. Hearing sessions as part of the EiP included discussion of the SA with the Inspectors considering how the SA was undertaken and how it had informed the Local Plan. There was also wide-ranging scrutiny of the housing requirement and alternatives considered in the SA, and the choice of strategic sites and the SA assessments of these sites. In particular, ST15: Land West of Elvington Lane was a focus for discussion at the EiP, as it had been through the development of the Local Plan.
- 4.2.7. During the EiP a series of consultations were undertaken reflecting a series of proposed changes to the Local Plan. At each of these stages, proposed modifications to the draft Local Plan were screened to determine whether any of them were likely to have significant effects and where the potential for effects was indicated, the relevant proposed modifications were then subject to SA, with the findings then presented in an addendum to the Publication Plan SA Report (2018). The SA addenda were updated at each stage to reflect the emerging outcomes of the examination process.
- 4.2.8. The Inspectors' Report concludes:
- “The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19. The sustainability appraisal was updated to assess the various sets of main modifications in a way that we have found to be adequate.”*



## 5 THE REASONS FOR CHOOSING THE LOCAL PLAN AS ADOPTED IN THE LIGHT OF THE OTHER REASONABLE ALTERNATIVES CONSIDERED

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### 5.1 OVERVIEW

- 5.1.1. SEA Regulation 16 (4e) requires a statement outlining “*the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with*” which reflects that the earlier SA Reports, in complying with SEA Regulation 12(2) should identify, describe and evaluate the “*likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*” and include “*an outline of the reasons for selecting the alternatives dealt with*” SEA Regulations Schedule 2 (8). Case law<sup>20</sup> confirms that the identification and selection of reasonable alternatives is primarily a matter for the Council, as the decision making body subject to challenge only on conventional public law grounds.
- 5.1.2. The SA of the Local Plan has been an iterative process, undertaken alongside and integrated with the development of the plan itself. The reasonable alternatives considered in preparing the Local Plan and appraised through the SA process have related to:
- housing and employment land targets (the amount of growth to be accommodated in the City over the plan period);
  - the Spatial Strategy (where, in broad terms, growth should be located in the City);
  - strategic land allocations; and
  - land allocations.
- 5.1.3. The findings of the appraisal of the preferred options and reasonable alternatives were reported in the SA Reports at each stage of Local Plan’s preparation and subject to public consultation.

### 5.2 THE REASONS FOR CHOOSING THE LOCAL PLAN AS ADOPTED AND FOR REJECTING REASONABLE ALTERNATIVES

- 5.2.1. The Local Plan has evolved over a number of years from the Preferred Options consultation (2013), through the Preferred Sites Consultation (2016), the Pre-Publication Draft (2017), Publication Draft (2018) to the four rounds of proposed modifications spanning 2019 to 2024. During the course of the preparation of the plan, the Council has identified and carefully considered a range of options relating to the quantum of growth to be accommodated over the plan period and its distribution across the city together with the site allocations to deliver that growth.

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<sup>20</sup> R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378

5.2.2. The reasons for selecting the preferred options for the Local Plan and for rejecting the reasonable alternatives identified and considered by the Council are set out in the sub-sections below.

### HOUSING GROWTH QUANTUM

5.2.3. A range of options for housing growth have been considered during the preparation of the Local Plan. The options considered are as set out in **Table 5-1**.

**Table 5-1 – Housing Growth Options**

Plan stage	Housing Growth Options considered	Reasons for the selection of the preferred option and rejection of the alternatives
2013 Preferred Options	<p>Option 1: Baseline of 850 dwellings per annum ('Policy-off' scenario based upon projected population growth);</p> <p>Option 2: 1,090 dwellings per annum (To support the economic visioning evidence base and representing an integrated approach to housing and employment growth);</p> <p>Option 3: 1,500 dwellings per annum (To meet housing and employment growth as well as newly arising affordable housing need);</p> <p>Option 4: 2,060 dwellings per annum (To meet housing and employment growth as well as existing and newly arising affordable housing need).</p>	<p>The preferred approach took forward option 2, which provided a scale of housing growth to support the preferred employment growth forecast.</p> <p>This was option considered to provide the choice for those who may take up new jobs to reside in York rather than commute into the district. The preferred approach represented an integrated approach to housing and employment growth to ensure a consistent and holistic policy stance in the Plan.</p> <p>The testing of higher growth options showed that they were unlikely to be realistically deliverable.</p>
2017 Pre-Publication Draft Local Plan	<p>Preferred Option: 867 dwellings per annum (dpa) – DCLG Baseline based on the July 2016 Household Projections</p> <p>Reasonable Alternative: 953 dpa – GL Hearn recommended figure (SHMA update, 2017). This reflects the demographic starting point of 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable</p>	<p><b>Reasons for the selection of the preferred option</b></p> <p>The Council's Local Plans Working Group (LPWG) and Executive considered a report in July 2017 which set out the CLG baseline and GL Hearn recommended housing figures for consideration. The housing figures presented reflected the latest sub-national household projections considered in the technical work of GL Hearn in the Strategic Housing Market (SHMA) update (2017). The figures presented for consideration superseded the housing figure set out in the Preferred Sites Consultation (2016) of 841 dwellings per annum.</p> <p>The Council's Executive determined that on the basis of the housing analysis set out in the report, the increased figure of 867 dwellings per annum (compared to the Preferred Sites Consultation figure of 841), based on the latest revised sub national population and household projections published by</p>

	<p>housing, in line with NPPG’s guidance for reasonable adjustments to the household projections to be made in light of market signals which may include land prices, house prices, rents, affordability, the rate of development and overcrowding.</p>	<p>the CLG, should form the basis of the housing growth figure for consultation in the Local Plan Pre Publication Draft. The selection of the preferred option reflects the decision of the Council to use the CLG baseline as the housing figure.</p> <p><b>Reasons for the rejection of alternative</b></p> <p>The Council’s Executive determined that the alternative figure prepared by GL Hearn in the draft SHMA, with the application of a further 10% to the 867dpa figure for market signals (to 953 dwellings per annum), was not accepted as the basis for the housing figure to be taken forward in the Local Plan. The Executive determined that the conclusions in the SHMA were “speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.” The alternative housing figure was therefore rejected.</p>
<p>2018 Publication Draft Local Plan</p>	<p>Option 1: Preferred housing figure: 867dwellings per annum (dpa) – MHCLG Baseline based on the July 2016 Household Projections</p> <p>Option 2: Reasonable Alternative: 953dpa – GL Hearn recommended figure (SHMA update, 2017). This reflects the demographic starting point of 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing, in line with NPPG’s guidance for reasonable adjustments to the household projections to be made in light of market signals which may include land prices, house prices, rents, affordability, the rate of development and overcrowding.</p> <p>Option 3: The Government’s consultation housing need figure: 1,070dpa – as set out in the Housing Need Consultation Data Table published for consultation by MHCLG in September 2017. This includes the latest household</p>	<p><b>Reasons for the selection of the preferred option</b></p> <p>The Council’s Local Plans Working Group (LPWG) and Executive considered a report in July 2017 which set out the MHCLG baseline and GL Hearn recommended housing figures for consideration. The housing figures presented for consideration reflected the latest sub-national household projections considered in the technical work of GL Hearn in the SHMA update (2017) and superseded the housing figure set out in the Preferred Sites Consultation (2016) of 841 dwellings per annum.</p> <p>The Council’s Executive determined that on the basis of the housing analysis set out in the report, the increased figure of 867 dwellings per annum (compared to the Preferred Sites Consultation figure of 841), based on the latest revised sub national population and household projections published by the MHCLG, should form the basis of the housing growth figure for consultation in the Local Plan Pre-Publication Draft (2017). This was supported for inclusion in the Publication Plan by the LPWG and Executive in January 2018. The selection of the preferred option reflects the decision of the Council to use the CLG baseline as the housing figure.</p> <p><b>Reasons for the rejection of alternatives</b></p> <p>In July 2017 the Council’s Executive considered the GL Hearn 2017 Draft SHMA Update (July 2017), which recommended a further 10% uplift to the 867dpa figure for market signals (to 953 dwellings per annum). The Executive resolved that the existing housing figure of 867dpa be taken forward in the Local Plan. The Executive’s reason for this was that the conclusions in the SHMA were “speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.” The SHMA 2017 Update alternative housing figure of 953 was therefore rejected. A Pre-Publication Draft was then the subject of a six week consultation period.</p> <p>In January 2018, the Executive considered the responses to the Pre-Publication Draft, the implications of the</p>

	<p>projections baseline with an upwards adjustment based on the Government's proposed formula for taking account of housing affordability ratios. The figure for dwellings per annum is for the period 2016-2026.</p>	<p>Government's consultation on a methodology calculating 5 year housing supply (indicating 1,070dpa), and the Government letter highlighting York as a City at risk of Government intervention unless progress with the Local Plan could be demonstrated.</p> <p>Officers recommended to the Executive that in light of the direction of travel in national policy, and the need to demonstrate progress in the plan making process, the Council would be in a more robust position if the scale of housing proposed at a number of existing proposed allocations were increased. However, this had to be balanced with the need to progress the Plan, and consideration given to whether further consultation would be required for these changes. Members only accepted increases to existing proposed strategic allocations. These changes to existing strategic allocations that had already been subject to consultation were considered not to be material, and Members were satisfied that the Local Plan could progress to Publication stage and final consultation. This decision was taken in light of their understanding of the Pre-Publication consultation responses, risk of further changes delaying moving forward with the Local Plan and on the basis of the desire to develop the Local Plan for the City of York based on the previously agreed housing figure, which they consider balances the need for growth with York's unique historic character and setting.</p>
<p>2019 Proposed Modifications Consultation</p>	<p>Proposed housing figure: 790 dwellings per annum (dpa) - Based on the Housing Needs Update, January 2019, prepared for the Council by G L Hearn.</p> <p>Publication Draft Preferred housing figure: 867dwellings per annum (dpa) – Ministry for Housing and local Government (MHCLG) Baseline based on the 2014 based household projections, released July 2016.</p> <p>Reasonable Alternative: 953dpa – GL Hearn recommended figure (SHMA update, 2017). This reflects the demographic starting point of 867 per annum (based upon the July 2016 household projections).</p> <p>The Government's indicative 2017 consultation housing need figure: 1,070dpa – as set</p>	<p><b>Reasons for the selection of the preferred option</b></p> <p>The Housing Needs Update, January 2019 (GL Hearn) was prepared in accordance with the PPG under the NPPF (2012), applying transitional arrangements, and is a detailed review of the latest national and sub-national 2016 based population and household projections and the latest mid-year population estimates. It therefore takes account of the latest 2016 based population projection data which sees a lower increase in York's projected population over the plan period than the previous 2014 based projections that underpinned the previous OAN calculations for York. It concludes that 790 dpa would be sufficient to respond to market signals, including affordability adjustments, and make a significant contribution to meeting affordable housing needs.</p> <p>The Council therefore considers that the proposed figure of 790dpa meets the NPPF (2012) requirements for local plans to ensure that the full, objectively assessed need for their area is met, is based on the most up-to-date population and household growth evidence for the City of York, and is the most appropriate housing figure for inclusion in the Local Plan.</p> <p><b>Reasons for the rejection of alternatives</b></p> <p>As noted above, York's objectively assessed housing need has been updated, based upon the Housing Needs Update, January 2019 (GL Hearn). This has been prepared in accordance with the PPG and is consistent with the NPPF (2012). The update concludes that 790 dpa would be sufficient to respond to market signals, including affordability adjustments, and make a significant contribution to meeting</p>

	<p>out in the Housing Need Consultation Data Table published for consultation by MHCLG in September 2017.</p>	<p>affordable housing needs. To be justified under the NPPF 2012, the Local Plan needs to be based on a proportionate evidence base (defined as “adequate, up-to-date and relevant”). The previously preferred housing requirement figure of 867 dpa has therefore been superseded as it was no longer consistent with the requirement to be up-to-date.</p> <p>The Council therefore considered that the alternatives appraised (867 dpa, 953 dpa and 1,070 dpa) do not provide as robust a basis for setting the housing requirement in the Local Plan as the preferred housing requirement of 790 dpa.</p>
<p>2021 Proposed Modifications consultation</p>	<p>Preferred Housing Figure (Proposed Modifications Consultation - SHMA 2019 Update) – 790 with annualised shortfall added of 32 leading to 822 dpa 2017-2033</p> <p>Alternative Housing Figure (Publication Draft 2018 preferred option) – 867 dpa 2017-2033</p> <p>Alternative Housing Figure (SHMA 2017 Update) – 953 dpa 2017-2033</p> <p>Alternative Housing Figure – Standard Methodology (MHCLG’s 2017 consultation housing need figure for CYC) - 1,070 dpa 2016-2026 confirmed as a Indicative LHN of 1,026 dpa using Dec 2020 finalised method).</p>	<p>The preferred option confirmed in the Local Plan is a figure of 822dpa which explicitly includes the annualised shortfall.</p> <p>The council’s reasons for the selection of the 822 dpa figure and rejection of the alternatives remains as outlined above.</p> <p>The 822 dpa figure is included in the Local Plan as adopted.</p>

## EMPLOYMENT GROWTH QUANTUM

5.2.4. A range of options for employment growth have been considered during the preparation of the Local Plan. The options considered are as set out in **Table 5-2**.

**Table 5-2 - Employment Growth Options**

Plan stage	Employment Growth Options considered	Reasons for the selection of the preferred option and rejection of the alternatives
2013 Preferred Options	<p>The baseline scenario: 14,471 additional jobs (based upon Oxford Economic Forecasting’s assessment of global and national changes in the economy applied at the York level);</p>	<p>Further work was undertaken to update the housing and employment growth assumptions. It was recognised that a collaborative approach should be taken between the two growth assumptions to ensure sustainable growth patterns.</p> <p>The Options put forward for employment growth were a result of up-to-date evidence base work looking at all employment sectors.</p>

	<p>Scenario 1: Faster UK recovery – 20,197 additional jobs;</p> <p>Scenario 2: Faster growth in key York sectors – 16,169 additional jobs. The preferred option represented a ‘policy on’ scenario based upon faster growth in advanced manufacturing, science and research, financial and professional services, and tourism and leisure to support 16,169 additional jobs.</p>	<p>The Preferred Approach (Scenario 2) was chosen as it reflected the Councils ambitions as set out in the York Economic Strategy, which was reflected in the Local Plan Vision. It was also felt to be realistic in terms of national economic performance and was therefore adopted as the preferred strategy for the lifetime of the plan at that stage.</p>
<p>2017 Pre-Publication Draft Local Plan</p> <p>With same options in the</p> <p>2018 Publication Draft Local Plan</p>	<p>Alternative Option: Baseline Scenario – 10,500 new jobs;</p> <p>Alternative Option: Employment Land Review (ELR) Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs;</p> <p>Preferred Option: ELR Option 2 – Re-profiled sector growth – 650 jobs per annum between 2017 and 2038 (around 13,650 over the period).</p>	<p><b>Reasons for the Selection of Preferred Employment Growth Target Option</b></p> <p>In undertaking the Preferred Sites Consultation in 2016, the Council identified its preference for the Preferred Option (ELR Option 2 Re-profiled Sector Growth). The Council endorsed this option as it reflected the economic priorities of the Council to drive up the skills of workforce and encourage growth in businesses which use higher skilled staff. This scenario was adopted for the Publication Draft Local Plan presented to the Local Plan Working Group (LWPG) and Executive in 2014 (withdrawn from further consultation).</p> <p>To inform the Local Plan Pre-Publication Draft approach, (confirmed in the 2018 Publication Draft Local Plan, the original 2015 Oxford Economic projections were subjected to a sensitivity test utilising the most recent econometric projections to ensure that the plan meets the demand forecast. The Council’s Executive decided to maintain ELR Option 2 as the best option for meet the economic needs of the City of York and achieve the desired outcomes of the York Economic Strategy (2016). The sensitivity test undertaken maintains the level of growth under this option as around 650 jobs per annum. The Preferred Option is also the best scoring in SA terms when considered against the reasonable alternatives.</p> <p><b>Reasons for the Rejection of the Alternative Employment Growth Options</b></p> <p>The Council rejected the alternatives as they would not meet the economic needs of the City of York and not achieve the outcomes of the York Economic Strategy. The alternatives did not perform as well as the Preferred Option in SA terms.</p>

## SPATIAL STRATEGY

- 5.2.5. Section 2, and specifically Tables 2.2, 2.3, 2.4, and 2.13, of the Publication Draft SA Report (2018) provides a comprehensive summary of the evolution of the spatial strategy, and its refinement. A comprehensive spatial strategy was set out in the Local Plan Pre-Publication 2017 (and appraised in

Local Plan Pre-Publication SA Report (2017)), covering the drivers of growth and factors that shape growth in the city, alongside the scale of growth and the key areas of change and opportunity that would support the delivery of the strategy (including policies on the city centre, York Central, Castle Gateway and strategic sites). The appraisal at Pre-Publication stage in 2017 reflected the latest baseline, deletion of policies and any amendments to policies. The policies that form the spatial strategy were then further refined in the draft Local Plan and appraised Publication Draft SA Report (2018).

5.2.6. Table 4.3 of the Local Plan Preferred Options SA Report (2013) presents the preferred spatial strategy and reasonable alternatives appraised at that stage. It comprises five interrelated policy areas:

- York Sub Area;
- factors which shape growth;
- spatial distribution;
- strategic site development principles; and
- the role of York's Green Belt and safeguarded Land.

### **Factors that shape growth**

5.2.7. With regard to the factors that shape growth, four alternatives were considered and appraised:

- Option 1: prioritise the socio-economic spatial principles;
- Option 2: prioritise the environmental principles;
- Option 3 (Preferred): take a balanced approach to the identified spatial principles; and
- Option 4: prioritise viability and deliverability.

5.2.8. The option 'taking a balanced approach' was taken forward as the preferred option. This continued to use the Spatial Shapers as outlined through the previous Core Strategy process, amended to reflect the evidence base and reflected in emerging policy as the spatial principles. This ensured that York's growth was allocated in a way that:

- recognises character and setting of York including the role of centres and the relationship between York and its surrounding settlements;
- conserves and enhances York's special historic and natural environment;
- protects York's Green Infrastructure;
- minimises flood risk.; and
- mitigates against climate change through locating development in the most sustainable locations.

### **Spatial distribution**

5.2.9. The preferred option to shape growth along with the evidence base were used to develop the alternatives for the spatial distribution of growth considered in Local Plan Preferred Options SA Report (2013):

- Option 1: (Preferred) Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;
- Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;
- Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;

- Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.

- 5.2.10. The preferred spatial strategy, which underpins the adopted Local Plan sought to take a balanced approach to spatial principles and the factors that shape growth, to protect and enhance the city's built and natural environmental assets, avoiding significant negative effects. The appraisal acknowledged that, in order to meet community needs and deliver economic growth, new development may place some pressure on these existing assets. This balanced approach was also expected to deliver new development that was well served, accessible and supported the use of sustainable public transport. None of the reasonable alternatives assessed as part of the SA performed better, in sustainability terms, than the preferred option that comprises the adopted spatial strategy.
- 5.2.11. The preferred spatial strategy outlined in 2013 was then taken forward (with refinement) for each subsequent stage of the plan, taking into account evidence base development. The refinement included moving towards identification of multiple freestanding settlements, reflecting site-based evidence. Adjustment to two of the strategic sites in 2016 (ST7: East of Metcalfe Lane and ST14: Land to North of Clifton Moor, which were originally considered urban extensions) to pull back their boundaries to mitigate against impact on historic character left them as freestanding developments. See Appendix K of the Policy Audit Trail, summarising each stage in the SA process and highlighting that ST7 and ST14 moved (for historic setting reasons) from being urban extensions to free standing settlements and that for similar reasons ST15: Land West of Elvington Lane was moved to the east and pulled away from the urban edge.

#### **Reasons for the selection of the preferred spatial strategy**

- 5.2.12. The spatial strategy outlined in 2013 Preferred Options, which was further refined and informed by evidence base development as the draft Local Plan was prepared, was considered to be the most appropriate, when considered against reasonable alternatives. None of the reasonable alternatives assessed as part of the SA performed better, in sustainability terms, than the preferred option that comprises the spatial strategy. The spatial strategy was considered to enable the delivery of sustainable development by:
- positively seeking to meet the city's objectively assessed development needs;
  - directing development to the most sustainable locations, making as much use as possible of suitable previously developed land (with some release of Green Belt land);
  - guiding the scale and pattern of development by the need to safeguard key elements that contribute 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;
  - focusing development in the main urban area and in new free-standing settlements with some urban and village extensions, limiting the amount of growth proposed around the periphery of the built-up area of York. While new settlements will affect the openness of Green Belt in those locations, their impact is assessed as less harmful to the elements which contribute to the special character and setting of York; and
  - providing opportunities for rural exception sites, including for Gypsy and Travellers not meeting the national policy definition and affordable homes in locations where new homes would not usually be appropriate.



### Reasons for the rejection of alternatives

- 5.2.13. The preferred strategy was taken forward as none of the reasonable alternatives appraised as part of the SA were considered to perform better in sustainability terms, than the preferred option.

### SITES

- 5.2.14. To inform the selection of sites, a total of 136 strategic and smaller scale (local) housing sites alternatives and 29 employment site alternatives were considered in the Publication Draft SA Report (2018) using tailored appraisal criteria and associated thresholds of significance. The findings of the appraisal were presented in Appendix H to the Publication Plan SA Report (2018) with the appraisal updated to reflect the main modifications within Appendix F of the 2023 SA Report Addendum. This included an appraisal of an additional eight sites following the submission of the draft Local Plan.

#### Strategic sites

- 5.2.15. In total, 38 strategic site alternatives were assessed in the SA, whilst for a number of these site options, assessments were also completed of alternative site boundaries. Proposed/potential strategic site allocations were subjected to more detailed assessment than local sites against the SA objectives reflecting 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. The detailed appraisal matrix for each site is contained in Appendix I to the Publication Plan SA Report (2018) and updated in Appendix G of the SA Report Addendum (2023).
- 5.2.16. To support the delivery of the development requirements, the Local Plan includes the allocation of 20 strategic sites:
- ST1 British Sugar / Manor School;
  - ST2 Former Civil Service Sports Ground Millfield Lane;
  - ST4 East of Grimston Bar;
  - ST5 York Central;
  - ST7 East of Metcalfe Lane;
  - ST8 Land North of Monks Cross;
  - ST9 Land North of Haxby;
  - ST14 Land to North of Clifton Moor;
  - ST15 Land West of Elvington Lane ;
  - ST16 Former Terry's Chocolate Factory;
  - ST17 Nestle South;
  - ST19 Northminster Business Park;
  - ST20 Castle Gateway;
  - ST26 South of Airfield Business Park;
  - ST27 University Expansion;
  - ST31 Land at Tadcaster Road;
  - ST32 Hungate;
  - ST33 Station Yard Wheldrake;
  - ST36 Imphal Barracks, Fulford Road; and
  - ST37 Whitehall Grange.

- 5.2.17. At draft Local Plan stage, 21 sites were identified. However, following consideration of updated HRA evidence, ST35 Queen Elizabeth Barracks, Strensall was removed from the draft Local Plan. In addition, Site ST16: Terry's Factory and ST32: Hungate saw amendments to site boundaries, in order to reflect development that had taken place on the ground. However, the modifications to the site boundaries did not result in substantive changes to the conclusions of the Publication Plan SA Report (2018).
- 5.2.18. The strategic sites taken forward and assessed within the Publication Plan SA Report (2018) were found to contribute to sustainable development, generating positive effects on a range of the SA objectives with many of these being significant (especially regarding housing and equality and accessibility). Negative effects were identified against the SA objectives that seek to protect elements such as biodiversity, landscape, water, health, waste, air quality and heritage. Also, whilst significant negative effects were sometimes identified for these SA objectives, such instances were rare, with most significant negatives confined to effects on land use (SA Objective 9).
- 5.2.19. 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 were found in the SA Report Addendum (2023) with but some uncertainty due the distance between the sites and Strensall Common.

#### **Reasons for the selection of the preferred strategic sites and rejection of alternatives**

- 5.2.20. The reasons for the selection of the strategic sites and for the rejection of the alternatives considered by the Council and appraised as part of the SA are set out in Appendix K to the Publication Plan SA Report (2018), which also contains a site trail audit, and Appendix I to the SA Report Addendum (2023).

#### **Local Sites**

- 5.2.21. In addition to the 20 strategic sites, the Local Plan identifies smaller scale (local site) allocations for housing (a total of 17 sites), employment (five sites), Travelling Showpeople (one site) (no sites are allocated specifically to meet the needs of Gypsies and Travellers with suitable provision available at existing sites and through strategic housing sites), student housing (one site) and a secondary school (one site).
- 5.2.22. The proposed changes considered through the main modifications included deletion of housing sites H22, H23, H56 due to the completion of development and H59 due to the findings of updated HRA evidence. One employment site (E8) was also deleted as it was no longer considered available for development. Additionally, a site for a secondary school (ST15a) was also identified and appraised.

#### **Reasons for the selection of the preferred land allocations and rejection of alternatives**

- 5.2.23. The reasons for the selection of the Local Plan local sites and for the rejection of the alternatives considered by the Council and appraised as part of the SA are set out in Appendix K to the Publication Plan SA Report (2018) and Appendix I to the SA Report Addendum (2023).

## **5.3 SUMMARY**

- 5.3.1. In summary, the preparation of the Local Plan took place over a number of years. Accordingly, there have been various iterations of the draft Local Plan with SA work taking place alongside evidence base development and public engagement. The Publication Plan SA Report (2018) and

updates in the various addenda set out the process by which the options for housing and employment development requirements, the spatial strategy, strategic land allocations and other land allocations were selected. All options were appraised in the same manner against the 15 SA objectives and the reasons for inclusion or rejection of strategic options and individual sites have been set out at the various stages of Local Plan preparation and EiP through the SA Report and addendum updates. Local Plan policies have been individually appraised against the SA objectives and commentary provided describing the potential effects to inform the Council's plan-making work.

5.3.2. The adopted Local Plan reflects the selected options following the consideration of the reasonable alternatives during each stage of its preparation, taking into account the evidence base for the Local Plan, engagement and assessment including SA. The adopted Local Plan also reflects the main modifications put forward by the Inspectors and appended in the final Report. The main modifications include amendments to some site allocations and designations, as well as changes to policy wording and supporting text. These are all deemed to be necessary to ensure that the Local Plan provides a sound and legally compliant Local Plan for the district.

5.3.3. The Local Plan involves:

- Focussing development on the main urban area of York and in new free-standing settlements with some urban and village extensions.
- Providing sufficient land to accommodate an annual provision of around 650 new jobs that will support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership area.
- Delivering a minimum average annual net provision of 822 dwellings over the plan period to 2032/33 that will support an overall housing requirement of at least 13,152 new homes. In addition to net completions, commitments and expected windfall, this is achieved through allocating a total of 15,430 homes with 8,160 homes on strategic site allocations and 1,733 homes on smaller housing allocations.
- Delivering at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.
- Delivering 12 new permanent pitches for Gypsies and Travellers and 4 permanent plots for Showpeople (as defined by Planning Policy for Traveller Sites) over the plan period and making provision for 26 permanent pitches for Gypsies and Travellers who do not meet the definition.
- Ensuring Green Belt permanence beyond the plan period, by allocating sufficient land for development to meet a further, minimum, period of 5 years to 2038.
- Conserving and enhancing York's historic environment by guiding the scale and pattern of development 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.
- Conserving and enhancing York's natural environment including the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function.

5.3.4. In the Council's view the Local Plan, as adopted, provides the framework for contributing to sustainable development across the city and offers significant opportunities to realise the Council's



vision for York. It reflects a rigorous process of evidence gathering, assessment, consultation and independent examination.

## 6 MONITORING

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### 6.1 OVERVIEW

- 6.1.1. It is a requirement of the SEA Regulation to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA<sup>21</sup> (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.
- 6.1.2. Monitoring the Local Plan for sustainability effects can help to answer questions such as:
- Were the SA's predictions of sustainability effects accurate?
  - Is the Local Plan contributing to the achievement of desired SA objectives?
  - Are mitigation measures performing as well as expected?
  - Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

### 6.2 THE LOCAL PLAN SA MONITORING FRAMEWORK

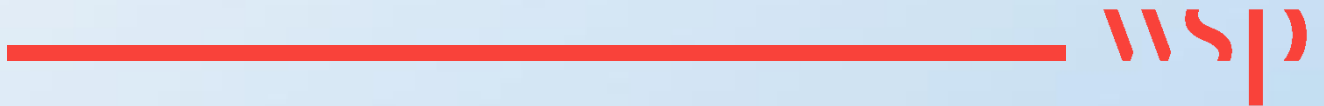
- 6.2.1. Monitoring the Local Plan's implementation will focus on:
- significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage occurs;
  - significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
  - where there is the potential for effects on sensitive environmental receptors.
- 6.2.2. **Appendix A** presents the indicators that comprise the Monitoring Framework for the Local Plan. Consistent with the monitoring proposals contained in the SA Reports, indicators have been identified for all of the SA objectives contained in the SA Framework. The monitoring programme will predominantly use existing data collated at the national and local level.
- 6.2.3. In addition to the SA monitoring process, the Local Plan will also be subject to an ongoing programme of monitoring, which will be reported on an annual basis in the Council's Authority Monitoring Reports (AMRs) and include the key indicators set out in the Local Plan. The AMRs will be available to view on the Council's website and will be used to monitor the implementation of the Local Plan's policies in terms of whether they are contributing to the achievement of the Local Plan vision. Monitoring will also identify unexpected outcomes which will allow the Council to take appropriate action.
- 6.2.4. The monitoring process for the Local Plan and the SA will be carried out on an annual basis through the application of the Monitoring Framework.

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<sup>21</sup> ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive. Published September 2005

# Appendix A

## MONITORING FRAMEWORK



	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
1	To meet the diverse housing needs of the population in a sustainable way.	<ul style="list-style-type: none"> <li>• Deliver homes to meet the needs of the population in terms of quantity, quality;</li> <li>• Promote improvements to the existing and future housing stock;</li> <li>• Locate sites in areas of known housing need;</li> <li>• Deliver community facilities for the needs of the population;</li> <li>• Deliver pitches required for Gypsies and Travellers and Showpeople.</li> </ul>	<ul style="list-style-type: none"> <li>• Population</li> </ul>	<ul style="list-style-type: none"> <li>• Net additional homes provided;</li> <li>• Supply of ready to develop housing sites;</li> <li>• % of new houses completed at densities in the policy: <ul style="list-style-type: none"> <li>• 100 units/ha within the city centre;</li> <li>• 50 units/ha within the York urban area;</li> <li>• 40 units/ha within the suburban area and Haxby/Wigginton;</li> <li>• 35 units/ha in the rural area and villages;</li> </ul> </li> <li>• % split of house types and flats;</li> <li>• Percentage of dwelling plots on strategic sites sold to self builders;</li> <li>• Losses of existing Gypsy pitches and / or Traveller pitches;</li> <li>• Net additional Gypsy and Traveller pitches</li> <li>• Losses of existing Travelling Showpeople plots (in Travelling Showpeople Yards or otherwise);</li> <li>• Net additional Travelling Showpeople plots;</li> <li>• Number and location of new houses in multiple occupation;</li> <li>• Number of new specialist housing schemes;</li> <li>• Gross affordable Housing Completions;</li> <li>• Affordable housing mix broken down by 1, 2, 3 and 4+ beds;</li> <li>• % of schemes delivering more affordable housing than the target percentage levels set out for site thresholds in the policy;</li> <li>• Year in which, and time elapsed since last appropriate assessment of housing need undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>

	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
2	Improve the health and well-being of York's population	<ul style="list-style-type: none"> <li>Avoid locating development where environmental circumstances could negatively impact on people's health;</li> <li>Improve access to openspace / multi-functional openspace</li> <li>Promotes a healthier lifestyle though access to leisure opportunities (walking / cycling)</li> <li>Improves access to healthcare;</li> <li>Provides or promotes safety and security for residents;</li> <li>Ensure that land contamination/pollution does not pose unacceptable risks to health.</li> </ul>	<ul style="list-style-type: none"> <li>Human health</li> </ul>	<ul style="list-style-type: none"> <li>Losses of community facilities;</li> <li>Number, type, size and location of new community facility;</li> <li>Losses of built sports facilities;</li> <li>Number, type, size and location of new built sports facility;</li> <li>Year in which and time elapsed since Built Sports Strategy and Action Plan last updated;</li> <li>Losses of childcare facilities;</li> <li>Losses of primary care facilities;</li> <li>Number, type, size and location of new primary care facility;</li> <li>Progress on relocation of services previously provided at Bootham Hospital to a new site on Haxby Road;</li> <li>Number, type, size and location of new emergency service facility;</li> <li>Loss of Community Facilities;</li> <li>Life expectancy at birth;</li> <li>Infant Mortality Rate;</li> <li>Death rates from respiratory diseases;</li> <li>Percentage of people describing their health as 'good' or 'very good';</li> <li>Rate of domestic and commercial burglaries;</li> <li>Percentage reduction in fear of crime statistics from CYC surveys;</li> <li>Percentage of residents who think where they live in York is a safe place to live;</li> <li>Reduction in households which have a deficiency to accessible openspace;</li> </ul>	<p>Access to:</p> <ul style="list-style-type: none"> <li>Doctors</li> <li>Openspace</li> </ul> <p>Progress on provision of ambulance spoke facilities at sites ST7, ST8, ST9, ST15 and ST16</p>



	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
				<ul style="list-style-type: none"> <li>Number of parks with Green Flag Award Status.</li> </ul>	
3	Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> <li>Provide good education and training opportunities for all;</li> <li>Support existing higher and further educational establishments for continued success;</li> <li>Provide good quality employment opportunities available to all;</li> </ul>	<ul style="list-style-type: none"> <li>Population</li> </ul>	<ul style="list-style-type: none"> <li>Number of new on-campus bed spaces;</li> <li>Number of additional purpose-built off-campus bed spaces;</li> <li>Number of on-campus bed spaces;</li> <li>No of 16 – 18 year olds in education or employment or training;</li> <li>% of the population with GCSEs / NVQs /further education qualifications;</li> <li>Unemployment rate;</li> <li>Percentage of people out of work for over 12 months;</li> <li>Number of JSA claimants;</li> <li>The number of educational facilities which are available for use by the wider community.</li> </ul>	<p>(Housing) Access to:</p> <ul style="list-style-type: none"> <li>nursery provision</li> <li>primary schools</li> <li>secondary schools</li> <li>higher education facilities</li> </ul> <p>(Employment) Access to:</p> <ul style="list-style-type: none"> <li>nursery provision</li> </ul> <p>Progress on provision of required education facilities at strategic sites and other strategic provision arising out of the cumulative impact of development.</p>
4	Create jobs and deliver growth of a sustainable and inclusive economy	<ul style="list-style-type: none"> <li>Help deliver conditions for business success and investment;</li> <li>Deliver a flexible and relevant workforce for the future;</li> <li>Deliver and promote stable economic growth;</li> <li>Enhance the city centre and its opportunities for business and leisure;</li> <li>Provide the appropriate infrastructure for economic growth;</li> <li>Support existing employment drivers;</li> <li>Promote a low carbon economy..</li> </ul>	N/a	<ul style="list-style-type: none"> <li>Total amount of additional employment floorspace by type (gross and net) overall and for each allocation;</li> <li>Employment land available by type (in hectares) overall and for each allocation;</li> <li>Amount of additional employment land (hectares) developed for B1, B2 and B8 overall and for each allocation;</li> <li>Number of jobs created per annum;</li> <li>Losses of employment land in employment areas and in the local authority area as a whole;</li> </ul>	<p>Not applicable at location level assessment but</p> <p>linked to all Transport accessibility given relationship to commuting.</p>



SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
			For Policy Monitoring	For Site Allocations
			<ul style="list-style-type: none"> <li>• Amount of completed retail, office and leisure development in the City Centre;</li> <li>• Amount of completed A1 (Food and non-food) floorspace (gross and net) by location;</li> <li>• Amount of completed A2-A5 floorspace (gross and net) by location;</li> <li>• Town Centre Health Check Indicators to be monitored through the AMR where data is available – to include:               <ul style="list-style-type: none"> <li>- Diversity of main town centre uses (by number, type and amount of floorspace);</li> <li>- Shopping rents (pattern of movements in Zone A rents within primary shopping areas);</li> <li>- Proportion of vacant street level property and length of time properties have been vacant;</li> <li>- Pedestrian flows (footfall); and</li> <li>- Customer and residents views and behaviour</li> </ul> </li> <li>• % of working age population in employment;</li> <li>• Local Indicator: Annual visitor expenditure and % increase on previous monitoring year;</li> <li>• Average length of stay of visitors in the City and % increase on the previous monitoring year;</li> <li>• Number of VAT registrations / number of VAT registered businesses;</li> </ul>	

	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
				<ul style="list-style-type: none"> <li>Percentage of population who are economically active;</li> <li>% Increase in employment generated by tourism;</li> <li>Number of knowledge based jobs and % increase on previous monitoring year;</li> <li>Number of 'green jobs' and % increase on previous monitoring year;</li> <li>Job density;</li> <li>No. of jobs created per annum;</li> <li>% increase in no. of jobs on previous monitoring year.</li> </ul>	
5	Help deliver equality and access to all	<ul style="list-style-type: none"> <li>Address existing imbalances of equality, deprivation and exclusion across the city;</li> <li>Provide accessible services and facilities for the local population;</li> <li>Provide affordable housing to meet demand;</li> <li>Help reduce homelessness;</li> <li>Promote the safety and security for people and/or property.</li> </ul>	N/a	<ul style="list-style-type: none"> <li>Number of new specialist housing schemes;</li> <li>Number of affordable homes delivered (gross);</li> <li>Gross Affordable Housing Completions;</li> <li>Affordable housing mix broken down by 1,2,3 and 4+ beds;</li> <li>% of new developments built that are within 400m of a community facility (Primary school, GP or Convenience Store) and within 400m of a bus route with a 15 min frequency;</li> <li>% of new community facilities that are within 400m of a bus route with a 15 min frequency;</li> <li>Loss of Community Facilities;</li> <li>Percentage of people who feel they can influence decision making in their locality.</li> </ul>	Access to: <ul style="list-style-type: none"> <li>non-frequent bus routes</li> <li>frequent bus routes</li> <li>park and ride bus stops</li> <li>railway station by walking</li> <li>railway station by cycling</li> <li>adopted highways</li> <li>Cycle routes</li> </ul> Additional access for Housing sites: <ul style="list-style-type: none"> <li>Supermarkets/convenience stores</li> </ul>
6	Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> <li>Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car;</li> </ul>	<ul style="list-style-type: none"> <li>Air</li> <li>Climatic factors</li> </ul>	<ul style="list-style-type: none"> <li>Delivery of strategic infrastructure schemes identified by target dates (to be monitored through LTP or successor Local Transport Strategy);</li> </ul>	Access to: <ul style="list-style-type: none"> <li>non-frequent bus routes</li> <li>frequent bus routes</li> </ul>

	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
		<ul style="list-style-type: none"> <li>Deliver transport infrastructure which supports sustainable travel options;</li> <li>Promote sustainable forms of travel;</li> <li>Improve congestion.</li> </ul>		<ul style="list-style-type: none"> <li>Amount of new development within 400 metres walkable distance of a frequent public transport route, local facilities (primary school, GP, convenience store) and within 100m of a cycle route;</li> <li>Number of developments submitting travel plans;</li> <li>Length of Public Rights of Way;</li> <li>New provision of cycle paths or cycle path improvements;</li> </ul>	<ul style="list-style-type: none"> <li>park and ride bus stops</li> <li>railway station by walking</li> <li>railway station by cycling</li> <li>adopted highways</li> <li>Cycle routes</li> </ul> <p>Additional access for Housing sites:</p> <ul style="list-style-type: none"> <li>Neighbourhood parade</li> <li>Supermarket</li> </ul> <p>Access to:</p> <ul style="list-style-type: none"> <li>Pedestrian Right of Way (PROW)</li> </ul>
7	To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	<ul style="list-style-type: none"> <li>Reduce or mitigate greenhouse gas emissions from all sources;</li> <li>Plan or implement adaptation measures for the likely effects of climate change;</li> <li>Provide and develop energy from renewable, low and zero carbon technologies;</li> <li>Promote sustainable design and building materials that manage the future risks and consequences of climate change;</li> <li>Adhere to the principles of the energy hierarchy;</li> </ul>	<ul style="list-style-type: none"> <li>Climatic factors</li> </ul>	<ul style="list-style-type: none"> <li>Renewable energy capacity installed by type;</li> <li>CO2 reduction from local authority operations;</li> <li>Per capita reduction in CO2 emissions in the Local Authority area;</li> <li>Number of development proposals of 10 dwellings or more or non-residential schemes over 1000m2 to integrate Combined Heat and Power and district / block heating networks.</li> </ul>	<p>Linked to all:</p> <ul style="list-style-type: none"> <li>All Transport accessibility indicators given relationship to trip generation and emissions</li> <li>All flood risk indicators given its link to managing the effects of climate change</li> <li>All Green infrastructure indicators given its link to managing the effects of climate change</li> <li>Air Quality Management Areas given its link to emissions.</li> </ul>
8	Conserve and enhance green infrastructure, biodiversity, geodiversity, flora and fauna for high quality and connected natural environment	<ul style="list-style-type: none"> <li>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</li> <li>Protect and enhance locally important nature conservation sites (SINCs);</li> <li>Create new areas or site of biodiversity / geodiversity value;</li> <li>Improve connectivity of green infrastructure and the natural environment;</li> </ul>	<ul style="list-style-type: none"> <li>Biodiversity</li> <li>Flora</li> <li>Fauna</li> </ul>	<ul style="list-style-type: none"> <li>Change in visitor numbers at and condition of Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC;</li> <li>Change in areas and population of biodiversity importance, including: loss and addition of priority habitats and species (by type);</li> <li>Change in areas designated for their intrinsic environmental value including sites of</li> </ul>	<p>Distance to/ incorporates:</p> <ul style="list-style-type: none"> <li>Statutory nature conservation designations;</li> <li>Regional Green Infrastructure Corridor;</li> <li>Site of Interest for Nature Conservation (SINC) site;</li> <li>Area of Local Nature Conservation (LNC) Interest;</li> <li>Ancient Woodland;</li> </ul>

	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
		<ul style="list-style-type: none"> <li>Provide opportunities for people to access the natural environment.</li> </ul>		<ul style="list-style-type: none"> <li>international, national, regional, sub regional or local significance;</li> <li>Amount of eligible open spaces managed to Green Flag award status;</li> <li>% of recognised wildlife sites in favourable condition in current Local Biodiversity Audit;</li> <li>Condition of Ramsar, SPA, SAC, SSSI, NNRs and LNR's;</li> <li>Amount of new accessible open space provided as part of residential development on strategic sites (ha);</li> <li>Amount of new accessible open space provided in areas of deficiency;</li> <li>Open space monitoring in line with Open Space, Sport and Recreation Study and distances to open space types;</li> <li>Number and extent of recognised green corridors;</li> </ul>	<ul style="list-style-type: none"> <li>Existing Openspace. District Green Infrastructure Corridor</li> <li>Local Green Infrastructure Corridor;</li> <li>Tree Protection orders</li> </ul>
9	Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> <li>Re-use previously developed land;</li> <li>Prevent pollution contaminating the land and remediate any existing contamination;</li> <li>Safeguard soil quality, including the most volatile agricultural land and protect and enhance allotments; Safeguard mineral resources and encourage their efficient use</li> </ul>	<ul style="list-style-type: none"> <li>Soil</li> <li>Material assets</li> </ul>	<ul style="list-style-type: none"> <li>PDL that has been vacant or derelict for more than 5 years;</li> <li>Production of primary won aggregates by mineral planning authority;</li> <li>Production of secondary and recycled aggregates by mineral planning authority;</li> <li>Number of Allotment sites;</li> <li>Amount of agricultural land used for development.</li> </ul>	<ul style="list-style-type: none"> <li>Brownfield / Greenfield/ Mixed</li> <li>Agricultural Land Classification</li> </ul>
10	Improve water efficiency and quality	<ul style="list-style-type: none"> <li>Conserve water resources and quality;</li> <li>Improve the quality of rivers and groundwaters;</li> </ul>	Water	<ul style="list-style-type: none"> <li>River quality;</li> <li>Number of developments that incorporate water efficiency measures a part of the implementation of Code for Sustainable Homes and</li> </ul>	Not applicable at location level assessment



	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
				BREEAM (linked to climate change).	
11	Reduce waste generation and increase level of reuse and recycling	<ul style="list-style-type: none"> <li>Promote reduction, re-use, recovery and recycling of waste</li> <li>Promote and increase resource efficiency</li> </ul>	<ul style="list-style-type: none"> <li>Material assets</li> </ul>	<ul style="list-style-type: none"> <li>Capacity of new waste management facilities by waste planning authority;</li> <li>Residual household waste per household (kg);</li> <li>% of household waste sent for reuse, recycling and composting;</li> <li>% of municipal waste land filled;</li> <li>The number of waste sites that are allocated and subsequently developed within York.</li> </ul>	Not applicable at location level assessment
12	Improve air quality	<ul style="list-style-type: none"> <li>Reduce all emissions to air from current activities;</li> <li>Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels);</li> <li>Support the development of city wide low emission infrastructure;</li> <li>Improve air quality in AQMAs and prevent new designations;</li> <li>Avoid locating development where it could negatively impact on air quality.</li> <li>Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users;</li> <li>Promote sustainable and integrated transport network to minimise the use of the car.</li> </ul>	<ul style="list-style-type: none"> <li>Air</li> <li>Human health</li> <li>Climatic Factors</li> </ul>	<ul style="list-style-type: none"> <li>Amount of reduction in Annual Mean NO2 concentrations;</li> <li>Amount of reduction in annual mean PM10 concentrations;</li> <li>% above / below legal requirements for NO2 and PM10;</li> <li>Number of Air Quality Management Areas in the city.</li> </ul>	Within/proximity to: <ul style="list-style-type: none"> <li>Air quality management area (AQMA)</li> </ul>
13	Minimise flood risk and reduce the impact of flooding to people and property in York	<ul style="list-style-type: none"> <li>Reduce risk of flooding;</li> <li>Ensure development location and design does not negatively impact on flood risk;</li> </ul>	<ul style="list-style-type: none"> <li>Water</li> <li>Human health</li> <li>Climatic factors</li> </ul>	<ul style="list-style-type: none"> <li>Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds;</li> </ul>	Within: <ul style="list-style-type: none"> <li>Flood risk zone 3b</li> <li>Flood risk zone 3a</li> </ul>

	SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
				For Policy Monitoring	For Site Allocations
		<ul style="list-style-type: none"> <li>Deliver or incorporate through design sustainable urban drainage systems (SUDs).</li> </ul>		<ul style="list-style-type: none"> <li>% of new dwellings in flood risk zones 2, 3a and 3b;</li> <li>% of new development incorporating SUDS;</li> <li>Number of new developments (Brownfield and Greenfield) achieving the targets for run off rates;</li> <li>Number of new developments where ground water or land drainage is connected to public sewers.</li> </ul>	<ul style="list-style-type: none"> <li>Flood risk zone 2</li> </ul>
14	Conserve and enhance York's historic environment, cultural heritage, character and setting	<ul style="list-style-type: none"> <li>Promote and enhance local culture;</li> <li>Preserve and enhance designated heritage assets and their setting;</li> <li>Preserve or enhance those elements which contribute to the special character and setting of the historic city as identified in the Heritage Topic Paper</li> </ul>	<ul style="list-style-type: none"> <li>Cultural heritage</li> <li>landscape</li> </ul>	<ul style="list-style-type: none"> <li>Progress on the preparation of characterisation studies for key strategic sites;</li> <li>Stock of Grade 1, 2 &amp; 2* listed buildings;</li> <li>Number of buildings on the At Risk Register;</li> <li>Number of Conservation Areas in York;</li> <li>% of Conservation Areas with an up to date character appraisal;</li> <li>% of Conservation Areas with published management proposals;</li> <li>Number of planning applications referred to English Heritage;</li> <li>Number of planning applications approved despite sustained objection from English Heritage.</li> </ul>	Distance to: <ul style="list-style-type: none"> <li>Listed Buildings</li> <li>Scheduled Ancient Monuments</li> <li>Areas of Archaeological Importance</li> </ul>
15	Protect and enhance York's natural and built landscape	<ul style="list-style-type: none"> <li>Preserve and enhance the landscape including areas of landscape value;</li> <li>Protect and enhance geologically important sites;</li> </ul>	<ul style="list-style-type: none"> <li>Cultural heritage</li> <li>Landscape</li> </ul>	<ul style="list-style-type: none"> <li>% of applications approved in the Green Belt that are compliant with Green Belt policy;</li> <li>Amount of eligible open spaces managed to Green Flag award status;</li> </ul>	Within: <ul style="list-style-type: none"> <li>An area of Historic Character and setting</li> <li>Conservation Areas</li> <li>Central Historic Core Character Appraisal Zone</li> </ul>



SA Framework objective	New sub-objectives Will the policy/allocation:	SEA Topic	Indicative Indicators to use	
			For Policy Monitoring	For Site Allocations
	<ul style="list-style-type: none"> <li>Promote high quality design in context with its urban and rural landscape and in line with the "landscape and Setting" within the Heritage Topic Paper.</li> </ul>		<ul style="list-style-type: none"> <li>Amount of new accessible open space provided as part of residential development on strategic sites (ha);</li> <li>Amount of new accessible open space provided in areas of deficiency;</li> <li>Open space monitoring in line with Open Space, Sport and Recreation Study and distances to open space types;</li> <li>Number and extent of recognised green corridors;</li> <li>% of LA covered by relevant landscape character appraisals/historic character appraisals;</li> <li>Areas showing change consistent with character area objectives;</li> <li>Extent of local historic parks and gardens at risk/lost.</li> </ul>	





Canon Court West  
Abbey Lawn  
Shrewsbury  
SY2 5DE

[wsp.com](http://wsp.com)

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