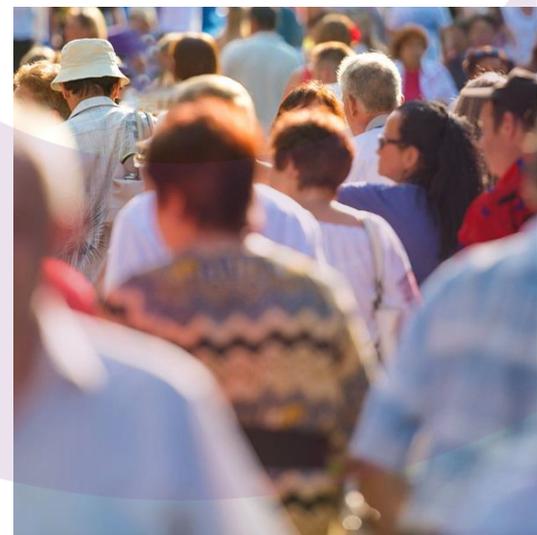
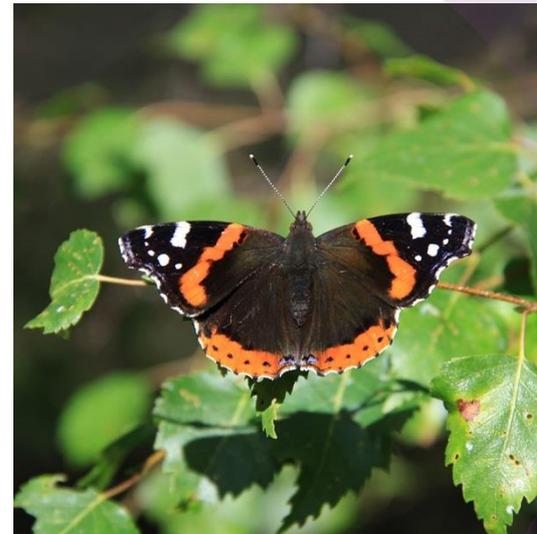


City of York Local Plan - Sustainability Appraisal

Non-Technical Summary

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



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2	Final	06/06/19





Non-Technical Summary

Purpose of this report

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

The Council, with support from Wood Environment and Infrastructure Solutions UK Ltd¹ (Wood), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft and published a SA Report alongside the consultation Local Plan in February 2018². The SA appraised the environmental, social and economic performance of the Local Plan Publication Draft against a set of sustainability objectives in order to identify the likely significant social, economic and environmental effects.

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

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

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

The following sections of this NTS:

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

What is the Local Plan Publication Draft?

The new Local Plan for the City of York will set out how much new development is to be accommodated in the District to 2033 (defining Green Belt boundaries until 2038) and set out where this growth will be located. The draft Local Plan includes the following key parts:

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

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





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

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

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

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

Update of the housing needs, HRA and Green Belt evidence

Housing Needs Update

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

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

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



Habitats Regulations Assessment

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

The HRA is a key part of the evidence base and directly linked to the SA in terms of the SA's assessment of the effects of the Plan's policies and proposals on achievement of SA Objective 8 (biodiversity). The SA Report (Feb 2018) noted that the HRA (2017)⁷ had not been finalised and identified that there was some uncertainty regarding likely significant effects on designated European conservation sites from some of the proposed policies (Policies SS13 and SS19) and site allocations (ST15, ST35, H59, E18).

Prior the submission of the draft Local Plan for examination, the Council updated their evidence on Habitats Regulations Assessment (HRA) (April 2018)⁸. Following Appropriate Assessment and the identification of mitigation, the HRA concluded that there would be no adverse effect on the integrity of any European sites from the policies of the Local Plan. To inform the HRA (April 2018), the Council also completed air quality modelling for effects of emissions from road traffic arising from the additional planned development on ecological sites. The air quality study is contained as an annex to the HRA (April 2018)⁹.

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

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

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

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

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

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

⁸ Waterman Infrastructure & Environment Limited for City of York council (April 2018) HRA of Plan Allocations - Habitats Regulations Assessment of the City of York Council Local Plan

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

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

Green Belt

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

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

What is Sustainability Appraisal?

National planning policy¹³ states that local plans are key to delivering sustainable development. Sustainable development is that which seeks to strike a balance between economic, environmental and social factors to meet the needs of the present without compromising the ability of future generations to meet their own needs. It is very important that the City of York Local Plan contributes to a sustainable future for the plan area. To support this objective, the Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan¹⁴. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised and also incorporates a process set out under a European Directive¹⁵ and related UK regulations¹⁶ called Strategic Environmental Assessment (SEA). Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures will be considered that could enhance such effects. SA is therefore an integral part of the preparation of the Local Plan.

Determining the significance of the Proposed Modifications for SA

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

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

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

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

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

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

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

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

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

How have the proposed modifications been appraised?

A SA Framework has been developed to complete the appraisal of the emerging Local Plan. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the SA and Local Plan. The SA objectives are shown in **Table NTS 2**.

Table NTS 2 SA Objectives used to appraise the Local Plan Publication Draft

SA Objective
1. To meet the diverse housing needs of the population in a sustainable way.
2. Improve the health and wellbeing of York's population
3. Improve education, skills development and training for an effective workforce
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy
5. Help deliver equality and access to all
6. Reduce the need to travel and deliver a sustainable integrated transport network
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment
9. Use land resources efficiently and safeguard their quality
10. Improve water efficiency and quality
11. Reduce waste generation and increase level of reuse and recycling
12. Improve air quality
13. Minimise flood risk and reduce the impact of flooding to people and property in York
14. Conserve or enhance York's historic environment, cultural heritage, character and setting
15. Protect and enhance York's natural and built landscape

The housing requirement options, Local Plan Publication Draft policies and thematic plan policies have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 3**. This scoring has been used where changes to the appraisal in the SA Report (Feb 2018) have been identified in **Appendix A** (with appraisals contained in **Appendices B, F and G**). Where the revision to matrices requires the removal of text, this is indicated using ~~strikethrough~~, where new text has been added this is underlined. Similarly, where the score has been amended on a matrix this is also indicated using ~~strikethrough~~ for the previous score and underlining for the new score. Where matrices were included in the SA Report Addendum (April 2018) and have been updated

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

Table NTS 3 Scoring System used in the appraisal of the draft Local Plan

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect on the SA objective.
+	The policy is likely to have a positive effect on the SA objective.
0	No significant effect / no clear link between the policy and the SA objective.
I	Depends upon Policy Implementation (applied to GIS Assessments)
?	Uncertain or insufficient information on which to determine effect on the SA objective.
-	The policy is likely to have a negative effect on the SA objective.
--	The policy is likely to have a significant negative effect on the SA objective.

Proposed housing and employment land allocations including strategic sites and reasonable alternatives have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance (see **Table 2.3**). The updated consideration of effects of housing sites are presented in **Appendix D**. The updated reasons for site selection and rejection are included in **Appendix E**.

Reflecting their importance to the delivery of the Local Plan and capacity to generate significant effects, the proposed allocated strategic sites in the Local Plan Publication Draft and reasonable alternatives have also been subject to more detailed appraisal. The updated appraisal matrices for the relevant strategic sites (ST15, ST33 and ST35) for consideration of effects are presented in **Appendix C**. The updated reasons for site selection and rejection are included in **Appendix E**.

What are the findings of the report?

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



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

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



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

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

Preferred housing growth figure

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

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

Spatial Strategy policies

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

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

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

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

Strategic sites

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

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

Local housing and employment sites

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

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

Thematic policies

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

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

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

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

Cumulative effects

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

Monitoring

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

Next steps

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

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

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

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

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

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