

**City of York Local Plan  
Examination**

**Hearing Statement on behalf of Defence  
Infrastructure Organisation**

**Matter 6: Infrastructure Requirements, Delivery  
and Development Viability**

March 2022

**Report title:** York Local Plan Examination – Phase 2 Hearing Statement – Matter 6

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**For and on behalf of Avison Young (UK) Limited**

# 1. Matter 6: Infrastructure Requirements, Delivery and Development Viability

- 6.6 In terms of the provision of necessary infrastructure, are the viability assessments contained within the evidence base sufficiently robust and are they based on reasonable assumptions? In particular:**
- e) have the costs of ecological mitigation measures been identified in the IDP and has the necessary mechanism for funding been secured? If not, why not and what are the implications for the delivery of the Plan?**
- 1.1 As a result of the conclusions of the Council's HRA (October 2020) document EX/CYC/58, the City of York Council (CYC) Composite Modifications Schedule (April 2021) identifies the need for ecological mitigation on four strategic allocations (ST7, ST8, ST9 and ST14) and effectively requires provision of open space to be designed with a view to mitigate impacts of recreation on Strensall Common SAC.
- 1.2 As far as we are aware, CYC have not identified the costs of providing this open space/ ecological mitigation.
- 1.3 The Council's Infrastructure Delivery Plan (IDP) May 2018 (SD128) was submitted alongside CD001. Since then, CYC has published:
- an Addendum to Annex 4 of the IDP - 14 November 2018 Gantt Chart – EX/CYC/7b;
  - an Errata addendum to IDP, 14 November 2018 EX/CYC/7c; and;
  - in response to the Inspectors request, an Updated Gantt Chart - January 2022 (EX/CYC/70).
- 1.4 The IDP (SD128) concentrates on various types of strategic infrastructure and whilst it includes some provision for Green Infrastructure etc..., it does not identify any ecological mitigation measures and hence no costs for this have been included in the IDP. The Addendums to this document noted above amend some of the infrastructure costs and present them in the form of a Gantt Chart. There are no ecological mitigation measures identified, whilst they are identified by various Proposed Modifications (PM58; PM59, PM60 & PM61) of document EX/CYC/58, they have not been identified in the IDP and therefore have not been costed.
- 1.5 We have seen no evidence to identify costs of providing these mitigation measures. As the cost of providing this ecological mitigation is unknown, it has simply been accepted that these costs can be absorbed by the development costs, for these four sites, and therefore it is not possible to determine how it might impact the viability of these sites and whether separate funding streams are required to enable its delivery. We also note that the Council's Viability Assessments produced in 2017 and updated in 2018 cannot have taken into account these additional costs. The plan is therefore not sound, as it is not possible to demonstrate that the evidence base is sufficiently robust.
- 1.6 On the other hand, DIO have detailed considerable ecological mitigation proposals that can be accommodated by the MOD in bringing forward development proposals at QEB. These proposals have been costed (i.e. Warden etc) and are considered the most effective way in managing recreational impact on Strensall Common and this direct ecological mitigation to Strensall Common SAC is deliverable as the land is within MOD ownership.

**6.7 Is the development proposed in the Plan, as set out in Policy SS1, financially viable?**

- 1.7 Given our response to 6.6 it is not clear it is not clear to us whether the development proposed in Policy SS1 is financially viable.

# Contact details

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