Appendix 2

Statement of Common Ground

City of York Council Local Plan

ST15 Allocation – Biodiversity

July 2022

Between City of York Council and the Langwith Development Partnership

1. Introduction

1.1 This Statement of Common Ground includes information about the biodiversity of the ST15 Allocation and associated areas of land. It explores the potential impacts, taking a very precautionary approach and goes on to consider the opportunities which could arise from such a development and how these could benefit biodiversity all of which is underpinned by a Biodiversity Net Gain calculation.

1.2 Extensive discussions over time between Langwith Development Partnership (LDP) and City of York Council (CYC) have ensured that the development of ST15 has developed into a position which is both realistic and achievable. The landholding available to ST15, OS10 and associated areas generates opportunities to offset impacts and create real benefits that will improve the overall biodiversity value of the area.

1.3 Two design options have been considered, Option 1 proposed by LDP and Option 2 proposed by CYC. The two options are very similar, the only difference being the alignment of the Western Access Road. For ease of reference, plans of each option are included in Appendix 1.

1.4 Four key components of the proposed ST15 development are detailed below. There is general agreement over all four components which are;

- The Ecological Baseline;
- Impacts on the Elvington SINC;
- Impacts on the Statutory Designated Sites, and

- Biodiversity Net Gain.

2. The Ecological Baseline

2.1. It is agreed that the majority of the ST15 and OS10 allocations comprise arable land with some more 'ecologically interesting' pockets of woodland and grassland. The Elvington Airfield Site of Importance for Nature Conservation (SINC) is an extensive area of Neutral Grassland mostly in poor condition with some areas in moderate condition and small pockets of acidic grassland and marshy grassland. The SINC supports an important population of skylark. The acidic grassland in the SINC qualifies as a Priority Habitat.

2.2. The ST15 allocation (Appendix 1 Area 1) is approximately 167ha and is dominated by arable land (58%) with areas of grassland amounting to 33%; the remainder is small tracts of woodland and scrub with occasional ponds, areas of hard standing as well as bare earth and ephemeral and ruderal vegetation.

2.3. The OS10 area (Appendix 1 Areas 6 & 7) an area of 190ha, which lies between ST15 and the Heslington Tillmire SSSI has been earmarked for habitat creation to offset any habitat losses which may result in ST15. Essentially, this is an arable area which has been described further below.

2.4. Other areas which fall within the proposal boundary are the Eastern and Western Access Roads and the Elvington Link (Appendix 1 Areas 2, 3 & 4) with associated road junctions, the secondary school (Appendix 1 Area 8) and the Western End of the Elvington Airfield SINC (Appendix 1 Area 5).

2.5. The habitat areas have been included in Tables 1 and 2 below.

Table 1 – Habitats in ST15 and OS10 (Appendix 1 Areas 1, 6 & 7)

Habitat	ST15		OS10	
	ha	%	ha	%
Arable	97.19	58.2	117.95	84.1
Neutral Grassland (Poor Condition)	50.74	30.4	8.90	6.3
Hard standing	11.74	7.0	2.01	1.4
Neutral Grassland (Moderate Condition)	3.60	2.2	0.61	0.4
Neutral grassland (good condition)	n/a	n/a	0.78	0.6
Bare ground	2.33	1.4	0.56	0.4

Habitat	ST15		OS10	
	ha	%	ha	%
Marshy grassland	0.69	0.4	n/a	n/a
Broadleaved plantation woodland	0.54	0.3	1.64	1.2
Mixed plantation woodland	n/a	n/a	5.90	4.2
Broadleaved semi natural woodland	n/a	n/a	1.17	0.8
Scrub	0.15	0.1	n/a	n/a
Ponds	0.06	0.0	n/a	n/a
Ephemeral	0.03	0.0	0.37	0.3
Tall Ruderal	n/a	n/a	0.18	0.1
Grass Verge	n/a	n/a	0.15	0.1
TOTAL	167.07	100.0	140.22	99.9

Table 2 – Other Baseline Habitats (Appendix 1 Areas 2, 3, 4, 5 & 8)

Habitat	Area (ha)				
	Western Access Road	Eastern Access Road	Elvington Link	Area 5	Secondary School
Neutral Grassland (poor condition)	0.30	7.44	n/a	17.88	3.47
Hard Standing	1.61	0.01	0.02	5.85	n/a
Neutral Grassland (moderate condition)	n/a	0.18	n/a	1.26	0.18
Neutral Grassland (good condition)	0.12	n/a	n/a	n/a	n/a
Bare Ground	n/a	0.54	n/a	0.12	0.53
Marshy Grassland	n/a	n/a	n/a	0.18	n/a
Scrub	n/a	0.52	n/a	1.30	0.15
Ephemeral	n/a	1.42	n/a	0.09	0.02
Acidic Grassland	n/a	0.03	n/a	n/a	0.97

Habitat	Area (ha)				
	Western Access Road	Eastern Access Road	Elvington Link	Area 5	Secondary School
Pond (Priority Habitat)	n/a	0.00	n/a	0.01	0.01
Broadleaved Semi Natural Woodland	0.41	n/a	n/a	n/a	n/a
Broadleaved Woodland	0.10	n/a	0.02	n/a	n/a
Tall Ruderal	n/a	n/a	0.09	n/a	n/a
Mixed Plantation Woodland	0.75	n/a	n/a	n/a	n/a
Mixed Woodland	n/a	0.02	n/a	0.48	n/a
Pond (Ornamental)	n/a	0.00	n/a	0.01	n/a
Arable	7.21	n/a	1.15	3.77	n/a
Introduced Shrub	n/a	n/a	n/a	0.09	n/a
Improved Grassland	n/a	n/a	0.91	0.81	n/a
Field Margin	0.37	n/a	0.22	n/a	n/a
Grass Verge	1.43	n/a	0.23	n/a	n/a
Bracken	n/a	n/a	n/a	0.32	n/a
TOTAL	**12.29**	**10.16**	**2.64**	**32.17**	**5.33**

3. Impacts on the Elvington SINC

3.1 It is agreed that the Elvington SINC is a locally important site. Its importance is largely because of its population of ground-nesting birds, particularly skylark. As a habitat, it is largely neutral grassland in poor condition, although some areas of acidic grassland (Priority Habitat) and marshy grassland are present. Some of the SINC will be lost under plans to develop ST15 with the associated Eastern Access Road and Secondary School. The retention of the western part of the SINC and habitat created within OS10, combined with an appropriate long-term management plan, will comfortably mitigate for the loss.

3.2 Within Area 5, the retained SINC to the west, it is proposed to remove the hardstanding and to replace it with good quality neutral grassland. It would also serve as a receptor site for any areas of acidic grassland which would be

translocated. It is anticipated that with good management and a larger area of suitable habitat this area would support more skylark than is currently the case.

3.3 The retained SINC includes a 40m wide strip of land which lies adjacent to the southern edge of ST15, shown on both plans in Appendix 1. This forms an effective link with the Dodsworth Farm SINC which is an important site for ground-nesting birds.

3.4 The proposal includes the creation of two main habitats in the OS10 area, good quality neutral grassland (87.50ha approx.) and floodplain habitat mosaic (40.78ha). Both habitats suitable for ground nesting and over-wintering birds. The flood plain mosaic has similar characteristics to the wetter habitats of the adjacent Heslington Tillmire SSSI and the drier neutral grassland has more similarities with the existing SINC. Consequently, the creation of these habitats gives rise to an extensive area which links effectively into existing valuable habitats. All new and retained habitats will be subjected to an appropriate management plan.

Table 3 – Habitats in the SINC

Habitat	Area of SINC (ha)				
	Assumed Lost			Retained	
	ST15	Eastern Access Road	Secondary School	Area 5	Outside of Proposal
Neutral Grassland (poor condition)	30.24	7.44	3.47	17.88	36.54
Hard standing	9.72	0.01	n/a	5.85	12.27
Neutral Grassland (moderate condition)	3.60	0.18	0.18	1.26	2.76
Bare ground	1.77	0.54	0.53	0.12	2.19
Marshy grassland	0.69	n/a	n/a	0.18	2.12
Scrub	0.14	0.52	0.15	1.30	0.02
Ephemeral	0.03	1.42	0.02	0.09	0.20
Acidic grassland	n/a	0.03	0.97	n/a	2.34
Pond (Priority Habitat)	n/a	0.00	0.01	0.01	n/a
Mixed Woodland	n/a	0.02	n/a	0.48	0.00
Pond (Ornamental)	n/a	0.00	n/a	0.01	0.04
Arable	n/a	n/a	n/a	3.77	n/a

Habitat	Area of SINC (ha)				
	Assumed Lost			Retained	
	ST15	Eastern Access Road	Secondary School	Area 5	Outside of Proposal
Introduced Shrub	n/a	n/a	n/a	0.09	0.00
Improved Grassland	n/a	n/a	n/a	0.81	n/a
Bracken	n/a	n/a	n/a	0.32	n/a
TOTAL	46.19	10.16	5.33	32.17	58.48

3.5 The timing of the habitat creation in Area 5 and OS10 will be important and will need to be completed at least one full growing season (March to September) prior to the start of any works in the SINC. This will ensure that any birds that are displaced have suitable habitat to move in to. The grassland will take several years to develop, the positive management will ensure that the grassland meets its full potential and it is anticipated that it could attain a suitably high standard that could be designated as a SINC.

4. Impacts on the Statutory Designated Sites

4.1 It is acknowledged that the development of ST15 and the increase in local population generates a potential increase in visitor pressure on statutory protected sites including Heslington Tillmire Site of Special Scientific Interest (SSSI) and Lower Derwent Valley Special Protection Area (SPA). It is also agreed that the landholding in control of LDP, both in OS10 and ST15, will provide alternative locations for informal recreation thus reducing the number of visitors to the SSSI and the SPA. Once detail designs are available for ST15 it will be necessary to update the Habitat Regulations Assessment (HRA).

4.2 Bird surveys of ST15, OS10 and the Elvington Airfield have found large numbers of skylark and low numbers of overwintering waders with few, if any geese or swans. The greatest interest and numbers of birds were found on the Airfield.

4.3 The Heslington Tillmire SSSI is the closest statutory site to ST15 and lies immediately adjacent to OS10; it is, at its closest point, 1km from ST15. The SSSI is bounded on three sides by public footpaths. The SSSI is important for various waders, typically associated with wetland habitats, specifically “lapwing, snipe, curlew, redshank, teal, shoveler and pintail.” (Heslington Tillmire SSSI Citation).

4.4 The Lower Derwent Valley SPA is 3.5Km from ST15 and supports various overwintering birds, including Bewick’s swan, golden plover, ruff, as well as, teal,

widgeon and shoveler. The site is considered more important because of the large and diverse assemblage of wintering birds.

4.5 An HRA produced for CYC and subsequently updated in 2019, suggested that OS10 could be used as an area for informal recreation. It will be necessary to ensure that public access to this area is managed so as not to disturb the bird interest. In an updated HRA it will be necessary to identify areas designed for public access which do not compromise the value of habitats for ground-nesting or over-wintering birds.

4.6 Bunding and hedgerow planting around the OS10 area will help to minimise the disturbance of ground-nesting and over-wintering birds whilst maintaining a substantial open area that will support large numbers of skylarks and waders. Viewing screens at various points along the hedgerows will allow visitors to observe birds all year round without causing disturbance.

4.7 A detailed visitor access management plan will set out in detail how visitors can use the area for recreation in such a way that will not detract from the bird interest of the area whilst not detracting from a positive visitor experience. Habitat management will be vital in maintaining the two functions by ensuring that pathways are maintained and therefore visitors are managed whilst other areas are managed to improve them botanically and as an optimal habitat for birds.

5. Biodiversity Net Gain (BNG)

5.1 The Defra Metric 3.1 has been used to calculate the Biodiversity Net Change that would occur based on the proposed development of ST15. It is agreed that the areas available for development and habitat creation/enhancement are such that the minimal gain of 10% is comfortably achievable. This is based on various assumptions designed to give a fully precautionary approach.

5.2 Two development options have been used to give two outcomes. The first option, proposed by the Langwith Development Partnership, the second is proposed by the City of York Council. The plans illustrating each option are included in Appendix 1.

5.3 In order to present a wholly precautionary approach, which demonstrates the minimum that could reasonably be achieved, several assumptions have been made;

- The habitats which lie within ST15 will be lost;
- The habitats which lie within the associated access roads, road junctions and the secondary school will be lost;
- Within the whole of OS10 (total area approx. 190ha) only 140ha (LDP Option) and 142ha (CYC Option) are being used;

- The Neutral Grassland in poor condition in the retained SINC, western end of the airfield, will remain in poor condition;
- Created habitat in the retained SINC will be Neutral Grassland in good condition,
- Created habitat in OS10 will be Neutral Grassland in good condition and Flood Plain Mosaic, and
- Woodland and other valuable habitats in the retained SINC and OS10 will be retained.

5.4 The outcomes of the BNG calculations are as follows;

LDP Option = 21.89% biodiversity gain

CYC Option = 16.63% biodiversity gain

In accordance with guidance set out in the National Planning Policy Framework 2021, all developments should be demonstrating a biodiversity gain. The net gains achieved with both options are well in excess of the anticipated minimum gain of 10% which will come into force in 2023.

5.5 Furthermore, the assumptions are such that in reality there will be an uplift in the biodiversity gain as a result of the following;

- Some habitat in ST15 and associated infrastructure will be retained and other habitat will be created. Created habitat could include substantial areas used for sustainable drainage solutions, public open space, general landscaping and screening.
- Options to extend the area used in OS10 remain;
- The Neutral Grassland in poor condition in the retained SINC can, through appropriate management, be improved to moderate and ultimately good condition, and
- Created habitat in the retained SINC could also include translocated habitats such as acidic grassland.