

**From:** Wheeler, Kate [REDACTED]  
**Sent:** 27 March 2023 21:46  
**To:** localplan@york.gov.uk  
**Subject:** York Local Plan Modifications consultation.  
**Attachments:** York Local Plan modifications consultation.pdf

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Dear Mr Ferris  
Please find attached Natural England's response to the York Local Plan Modifications Consultation.  
Thank you  
Kind regards  
Kate Wheeler  
[REDACTED]



<http://www.naturalengland.org.uk>

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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Date: 27 March 2023  
Our ref: 421695



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## **BY EMAIL ONLY**

Dear Mr Ferris

### **Planning consultation: CITY OF YORK LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION (February 2023)**

Thank you for your consultation on the above which was received by Natural England on 13<sup>th</sup> February 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has the following comments to make on the main modifications consultation.

#### **Changes to housing allocation numbers**

Natural England has not checked whether dwelling numbers of allocations have changed as part of these modifications. Natural England advises that this is checked with regards to the 5.5km Zone of Influence around Strensall Common SAC and whether the proposed modifications have resulted in an increase of individual dwellings in this zone and whether the Habitats Regulations Assessment requires amending.

#### **Strensall common**

Some proposed modifications include the requirement to provide a detailed site wide recreation and open space strategy and demonstrate its application in site master planning, this will be to ensure impacts identified in the HRA (2020) because of recreational pressure on Strensall Common SAC are mitigated. The modifications state that the open space provision that satisfies policies GI2a and GI6 is required.

To achieve this, it is recommended that a Supplementary Planning Document (SPD) is prepared to provide detailed guidance on how policies or proposals in the plan will be implemented and will link with policies G12a and G16. An Open Space and Green Infrastructure Supplementary Planning Document (SPD) that covers open space provision and Green Infrastructure (GI), will provide more detailed guidance on how policy is applied when it comes planning open space and GI.

The SPD should aim to enhance the natural and built environment in the city, by helping applicants and developers ensure that development proposals make the most of opportunities to improve existing, and create new green infrastructure and open space.

An SPD can help with the plan in terms of detailing the requirements around GI and open space provision and what is required for development, and also with specific requirements around Strensall Common.

With regards to Strensall Common SAC Natural England advises that the Suitable Accessible Natural Green Space (SANGS) guidance (attached alongside this letter) can be helpful in designing a SANGS, if this is proposed as mitigation. It should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Such provisions can help minimise any predicted increase in recreational pressure by containing the majority of recreation within and around the development site boundary away from European site.

As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.3 - 2.7 km<sup>1</sup> within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long-term maintenance and management of these provisions
- Safe pedestrian connections with residential areas;
- Linkages with other open spaces and walking routes;
- Provision of attractive walking routes with appropriately surfaced paths;

We note that the HRA (dated 2020) highlights that '*ii. Proposals for other housing development which are not within plan allocations will not be permitted unless it can be demonstrated that they will have no adverse effects on the integrity of the SAC, either alone or in combination with other plans or projects. Any necessary mitigation measures may be sought through planning contributions and must be secured prior to the occupation of any new dwellings and secured in perpetuity. Open space provision must also satisfy policy GI6*'. We therefore advised that the details of such financial contributions are included within the SPD.

The new GI Framework will help local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI the delivery of the local plan and associated new development. This framework can be used to develop GI policy and we recommend that plan refers to the 15 GI principles which set out the why, what and how-to do-good GI. The principles in conjunction with the Green Infrastructure Mapping Database - Beta Version 1.1 can be used to assist in planning GI strategically and inform policy.

Development should be based on the Green Infrastructure Principle What 4 - GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all.

The plan should reflect the Green Infrastructure Principle Why 2 Active and healthy places to achieve - green neighbourhoods, green / blue spaces and green routes that support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life. GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding, and poor air quality.

SuDS should reflect Green Infrastructure Principle Why 4 - GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local

and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits. SuDs should be integrated and linked to green infrastructure beyond the site boundaries.

Please find attached the links to the information, which contain detailed information on how to plan and incorporate GI in the plan. It is important to ensure detailed guidance is available to developers in order for development proposed in the plan to be deliverable.

- [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk)
- [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk)
- [The summary of the GI standards;](#)

Natural England would be happy to advise further on the SPD, and suggest it is initially scoped out to include the process for GI and open space provision overall and specifically for Strensall Common.

### **Biodiversity Net Gain**

The modification to Policy GI2 (Modification ref: MM9.3) to include reference to a biodiversity net gain in accordance with the Environment Act 2021 is welcomed, however we recommend that this could be strengthened by minor amendments to the wording to include:

- Reference to achieving 'measurable' net gains in biodiversity to align with the updated wording of the National Planning Policy Framework (NPPF) and the biodiversity gain objective introduced by the Environment Act 2021.
- Highlight how biodiversity losses and gains will be measured. The latest version of the Biodiversity Metric should be used
- for this purpose.
- Outline how the strategic significance value in the Biodiversity Metric should be applied. The Biodiversity Metric applies a higher biodiversity unit score to habitats identified as of strategic importance to the local area, further information relating to strategic significance can be found in the Biodiversity Metric 3.1 User Guide Paragraphs 5.16 -5.24. It is noted that Policy GI2 states biodiversity net gains can contribute to the recovery of priority species and habitat, however clear guidance should be provided on how relevant local priorities should be considered in relation to the strategic significance value. For example, the Local Nature Recover Strategy, Green Infrastructure Corridors, Biodiversity Action Plan Habitats, National Character Area priorities, Biodiversity Action Plans, River Basin Management Plans and Catchment Plans. This could be included within a Supplementary Planning Document.

As highlighted above we note that City of York Council's individual approach to the delivery of biodiversity net gain not been outlined within Policy GI2 and would encourage a commitment to produce an SPD to provide detailed guidance on the local priorities for BNG and its implementation within the district. This should include;

- A specific minimum target for biodiversity net gain across the district or within certain areas. We highlight that there is potential for Local Authorities to set more ambitious targets for biodiversity net gain within certain areas or allocations.
- The use of thresholds for different development types, locations or scales of development proposals and the justification for this. It is noted that the Policy Explanation for Policy GI2 states "*Net gains in biodiversity can be delivered by almost all development*", whilst this is welcomed, specific suitable on-site habitat and species enhancements which contribute to locally identified priorities should be highlighted and guidance on the information required when including these in a planning application provided.
- The legal mechanism for securing management and monitoring requirements required for on and off-site BNG. Local Authorities may consider setting targets to secure sites for longer periods of time where it is advantageous to meet identified strategic objectives in the local area.

- The use of a map. Mapping existing biodiversity assets and opportunity areas will ensure compliance with national planning policy and help to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.

Natural England can offer support and advice to you on the scope and content of such a document.

To provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Kate Wheeler  
Yorkshire and Northern Lincolnshire Area