

From: YWT Planning <planning@ywt.org.uk>
Sent: 27 March 2023 16:03
To: localplan@york.gov.uk
Subject: Draft Local Plan MM Consultation
Attachments: YWT response York Local Plan PMM1 CE.docx

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Good afternoon,

Thank you for consulting Yorkshire Wildlife Trust, please find our comments attached.

Kind regards,

The Planning Team
Yorkshire Wildlife Trust
planning@ywt.org.uk



Yorkshire Wildlife Trust is a company limited by guarantee, registered in England Number 409650.
Registered Charity Number 210807. Registered Office: 1 St George's Place, York, YO24 1GN.



DATE: 24/03/2023

BY EMAIL ONLY:

Local Plan Proposed Main Modifications Consultation

Thank you for consulting Yorkshire Wildlife Trust, we have reviewed the submitted information and our comments are as follows:

PMM 01: ST15 (Policies Map South)

Yorkshire Wildlife Trust have previously raised concerns in regard to this particular allocation as a whole, we were and still are concerned that the configuration of this site will have unacceptable impacts on the Elvington Airfield SINC.

The SINC is an area of grassland which is very important for breeding skylark and is likely to support birds which are part of the designation for the Lower Derwent SPA. Development of a central part of the airfield will divide up the SINC with an area of development towards the western end of the airfield. At present birds are using all of the airfield for both breeding and overwintering as the grassland is one of the very few large areas of suitable habitat close to the SPA.

The western end of the airfield is the least disturbed area furthest from the village of Elvington and nearest to the Tilmire SSSI and will therefore be the most valuable for wildlife. We can see that modifications proposed include the addition of the Western part of the runway as an ecological mitigation area, which is positive to see, however this does not address the outstanding issue of dividing the SINC site.

In addition to this, having an ecological mitigation area directly bordered by what is allocated to be a significant residential development raises further concerns regarding how effective this area will be in its intended purpose. Furthermore, policy SS13 which relates to this area of land and its development, specifically states that *"Impacts on biodiversity within the site and zone of influence will be addressed by following the mitigation hierarchy with the overall aim to prevent harm to existing biodiversity assets, delivering no net loss for biodiversity and maximise further benefits for biodiversity."*

Similarly, Policy GI2 states that development should *"avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs), whether directly or indirectly"*

This allocation, and its modifications contradict these policies.





It is important that planning policies understand the danger of 'death by 1000 cuts', and that the fragmentation of habitats is detrimental to the future of wildlife. Habitats need to be bigger, more joined up and part of a network which allows for better connectivity. Non-designated land still holds value for wildlife and can still be of significance to protected species such as ground nesting birds and migrating waders. This allocation does not respond positively to the wider environment or sufficiently consider subsequent environmental impacts, which in our view would leave doubts regarding the 'soundness' of the local plan.

PMM32: Moor Lane, Woodthorpe (Policies Map South)

Yorkshire Wildlife Trust considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts.

PMM67: Strensall Common Special Area of Conservation (400m buffer)

The decision to include a 400m linear distance buffer from the SAC boundary in accordance with Policy GI2a is a very positive and logical addition to the local plan and Yorkshire Wildlife Trust support this.

PMM68: Strensall Common Special Area of Conservation (5500m buffer)

The decision to include a 5.5km linear distance buffer from the SAC boundary in accordance with Policy GI2a is a very positive and logical addition to the local plan and Yorkshire Wildlife Trust support this.

MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall

The Trust are still supportive of the decision to delete this policy from the local plan. The Trust considers that the exclusion of Queen Elizabeth Barracks as an allocation in the Local Plan and the removal of Policy SS19 shows that the plan was positively prepared by responding to objections from Natural England and Yorkshire Wildlife Trust amongst other objections. The plan will also be more





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 Yorkshire Wildlife Trust

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consistently justified, effective and consistent with national and international policy on the protection of habitats.

If you have any further questions please contact us on the address below.

Kind regards,

**The Planning Team
Yorkshire Wildlife Trust**

planning@ywt.org.uk



ywt.org.uk

Yorkshire Wildlife Trust is the only charity entirely dedicated to
conserving, protecting and enhancing Yorkshire's wildlife and wild places