

CITY OF YORK LOCAL PLAN PHASE 4 HEARINGS

RESPONSE TO INSPECTORS' MIQs

FROM HESLINGTON PARISH COUNCIL

AUGUST 2022

Matter 5 – Green Infrastructure

5.1 Is the general approach of Policy GI1 to green infrastructure sound?

The policy is not sound as, in the case of ST15, close to or including sites of high ecological value, it demands a high level of mitigation at a cost of some £4million. This mitigation, OS10, entails the removal of a large tract of Best and Most Versatile (BMV) land from the production of food. Removing topsoil from OS10 means that the rewilding is irreversible. Agricultural land is a major component of Green Infrastructure, and food security must be a priority. This remote site also demands a high level of new infrastructure all of which is damaging to green infrastructure.

Only 9 years ago, farmers within CYC were being encouraged through the CYC Biodiversity Action Plan to get involved in Stewardship schemes to promote biodiversity within a food producing setting. This has been successfully done across the site that will be removed by OS10. The benefits of higher level stewardship schemes are for the long term, far longer than nine years. The creation of OS10 will cause nine years of public funding to be wasted.

One of the purposes of GI1 is “aiding resilience to climate change.” Carbon is released from the soil when it is moved by ploughing. Removing the topsoil to create the OS10 mitigation site for ST15 will release large quantities of carbon. The felling of two areas of long established, woodland (0.15 Hectares) to create a route from ST15 to A64 GSJ will reduce carbon capture. Breaking up the Airfield will also release carbon. We await detailed information about the total number of hectares of currently productive Best and Most Versatile farmland to be taken out for the ST15-A64 road link.

Altogether, there is a significant detriment to carbon zero ambitions associated with ST15 from both release of carbon from current carbon sinks and increased carbon emissions. Carbon emissions will emanate from all the construction vehicles for OS10, for the link roads and for the demolition of the air strip, and for ST15 itself, as well as long term higher emissions from increased vehicular traffic once the settlement is inhabited.

The best remedy would be to avoid this site. Alternatively consider biodiversity offsetting off site which the new environment bill enables, or use the adjacent Wheldrake Wood which is

a recent plantation on lowland heath. Coniferous woodland is considered as low ecological value.

5.2 Does Policy GI2 deal with biodiversity and access to nature in a reasonable way?

Draft LP p. 166 "(viii) maintain and enhance the diversity of York's Strays for wildlife;" Please see comments in 5.1 above. The area south-east of Heslington known as Langwith Stray is currently a haven for mammals including bats and hares, rich in field and woodland birdlife including 3 owl species, and innumerable insects. The quiet open fields, dark skies and ancient hedgerows are the ecological infrastructure that makes this possible.

In the areas south-east of Heslington Village there needs to be more separation between recreational routes and sites of high biodiversity, otherwise neither option will be successful. As was soundly argued by CYC during Phase 3 Hearings with respect to protection of Strensall Common (21.07.2022), dog walkers typically take their dog out for at least a one kilometre walk. This will bring a large new population of dogs onto Heslington Tillmire SSSI, as well as the proposed OS10 mitigation site and the SINC and mitigation sites adjacent to ST15. This will inevitably disturb ground nesting birds and other wildlife as well as affecting the necessary flora that supports them. In addition, leisure cyclists and mountain bikers will have easy access to these sensitive sites under the current proposals, as well as unauthorised motor vehicles. The combination is a recipe for failure of GI1 and GI2.

Considering the level of harm to ecologically sensitive sites that unrestrained domestic pet and cycle access can cause, HPC suggests that a remedy would be to increase Suitable Alternative Natural Greenspaces (SANGs) on ST15 of appropriate dimensions and positioning to encourage dog walking in dedicated dog walking areas. Clever planning should actively discourage dog walking and cycling in the lanes leading to OS10 and the SSSI from ST15, rather than promoting them.

5.5 Will Policy GI4 offer appropriate protection to trees and hedgerows?

The proposed new link road between ST15 and the A64 entails the removal of hedgerows and woodland, some of which are potential PAWS sites. The link roads is routed via two woodlands with an expected loss of 0.15 Hectares of long established native woodland. Ancient hedges and a stand of oak trees are threatened where the new link road meets Langwith Stray (aka Langwith Lane) whether this be by flyover or underpass.

Peak Ecology's plan for OS 10 suggests the removal of hedgerows to make the site more open. The use of metric 3.1, which Natural England admits is imprecise and evolving, should be closely and independently monitored in order to avoid the chance of subjective opinion resulting in an incorrect outcome.

Draft LP 9.13 p.170 “In exceptional circumstances, where the benefits of the development substantially outweighs the retention of significant trees within the site and there are absolutely no feasible alternatives, appropriate mitigation and compensatory tree planting will be required within the site boundary”. HPC asks what alternatives have been explored by CYC? Where have the reasons for rejecting alternatives and choosing to fell possibly ancient woodland and hedgerows been published? In what way are the circumstances “exceptional”?

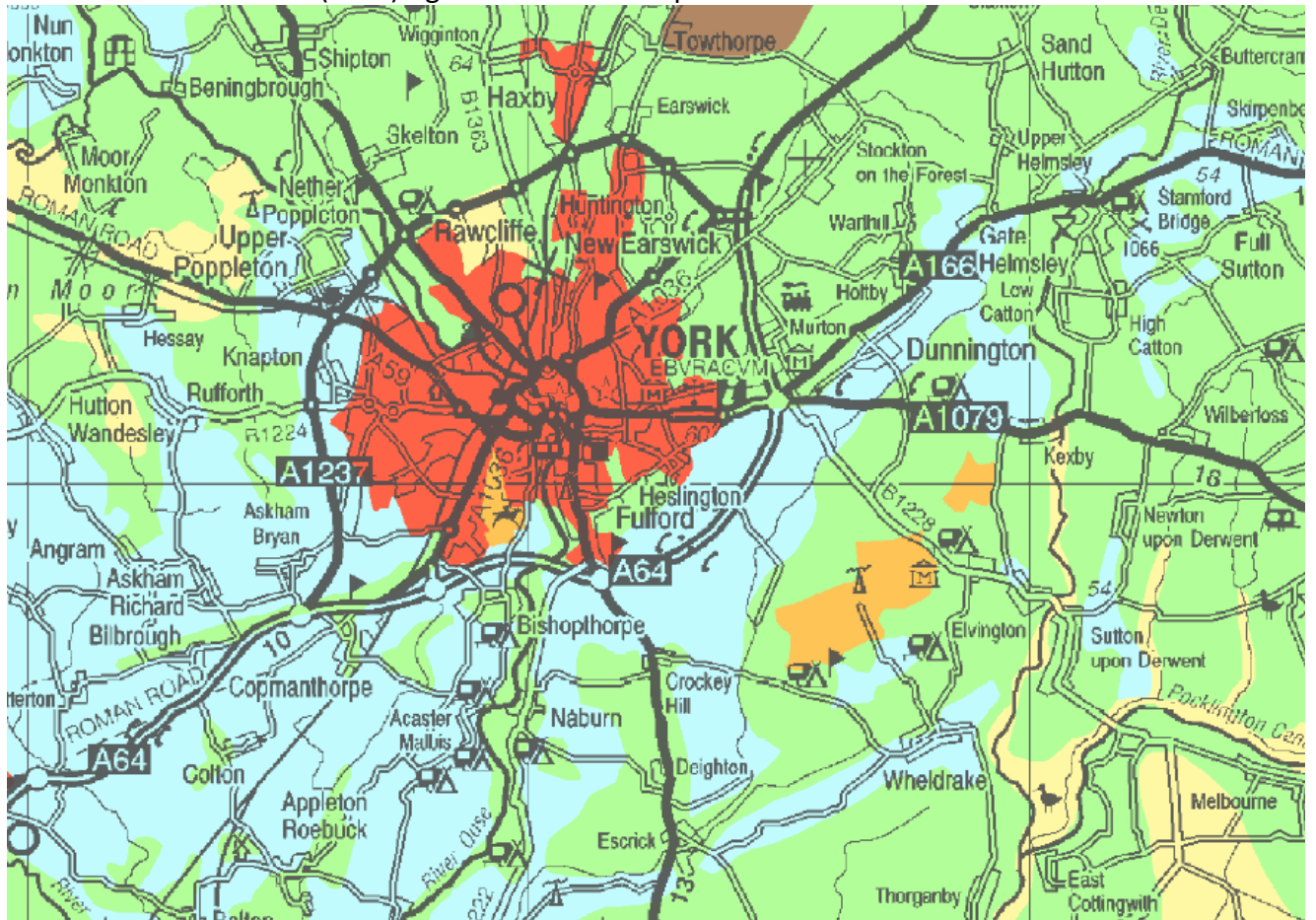
5.7 Is the approach of Policy GI6 to the provision of new open space sound?

HPC suggest that the creation of OS10 is not sound. Considering the information presented in EX/HS/P3/M7/EL/8 we wish to raise the below points for the inspectors’ consideration.

- The proposed development has the potential to significantly impact a large area of Best and Most Versatile (BMV) Agricultural Land. This land has been classified as Grade 2 by Natural England – please see map below. We are keen to ensure the economic and other benefits of BMV agricultural land are optimised, and poorer quality land is used instead of higher quality land. The 25 year Environment Plan also affords protection for the best agricultural land.
- We also note that the applicant has proposed to locate most of the ecological mitigation and habitat enhancement on BMV grade 2 land, further reducing this finite resource.
- Furthermore, whilst it is the developer’s decision to set a level of BNG, and as such, the proposals of ‘LDP Option = 21.89% biodiversity gain or CYC Option = 16.63% biodiversity gain’. This is above the anticipated national minimum gain of 10%. As such we feel such gain should not result in further loss of BMV grade 2 land.
- The ongoing management of the ecological mitigation and habitat enhancement areas could safeguard aspects of BMV land, by ensuring the agricultural species found across the proposed site are retained through ongoing agricultural land management practices. As such, this could be done through agreements as demonstrated within the International Advanced Manufacturing Park national infrastructure project. Such agreements with the farming community safeguarded the farming enterprises and delivered the environmental goals.

It remains unclear how “Open” OS10 would be. It cannot be generally accessible for recreation for the reasons given above. If hides for bird watching are proposed, where will they be sited and where will car access and parking be provided? Alternative mitigation sites have been suggested in 5.1 above.

Best and Most Versatile (BMV) Agricultural Land Map:



Grade **Description**

- 1 Excellent
- 2 Very Good
- 3 Good to Moderate
- 4 Poor
- 5 Very Poor

Non-Agricultural Land

- Other land primarily in non-agricultural use
- Land predominantly in urban use