

City of York Council Draft Local Plan: Heslington Parish Council response to main Modifications Consultation February-March 2023.

Supporting documentation may cover several Main Modifications. Some modifications may have more than one Supporting Document. Please refer to the title of the relevant sections.

The Main Modifications are listed in sections corresponding with the draft Local Plan.

Spatial Strategy

Spatial Strategy MM3.17 Policy SS8: Land Adjacent to Hull Road

p.21 (ii) Traffic access to ST4 needs to be reconsidered in the light of already increasing congestion on Field Lane and associated highway connections. The cumulative impact on Heslington of traffic and cycle routes into and around ST4, ST15 and ST27 has not been adequately considered. There would be opportunities with the proposed reconfiguration south of Grimston Bar for ST15, to link ST4 and ST27 directly into the road network to A64 there as well, while providing shorter, safer cycle/walking routes from the site into York.

Please see supporting documentation below.

Spatial Strategy MM.3.51 Policy SS13: Land West of Elvington Lane

P.29 (v) We welcome the specification of biodiversity protection for Elvington Airfield SINC. Please add **“for protection of the agricultural bird assemblage including granivorous birds”**
Rationale: see supporting documentation.

(vii) The mitigation hierarchy is contradictory, problematic and requires further consideration. Please see supporting documentation.

Add **“potential adverse effects on Heslington Tillmire SSSI remain. The SA should be reviewed following further changes proposed to the policy” (SA Addendum Jan 2023 p.33), “and prior to commencement of the development.”**

p.30 Second bullet point of (vii) regarding master planning for recreation around ST15, add **“precedence must always be given to protection of the SSSI and mitigation for Airfield SINC.”**

p.30 (viii) the **5 year time span** for ecological mitigations should be **reinstated** in order to ensure sufficient time for different flora to develop and bird colonies to establish successfully.

Please see Supporting Documentation below.

Spatial Strategy MM3.52 Policy SS13: Land West of Elvington Lane

(ix) “**otherwise referred to as Langwith Stray.**” **Delete** this wording which is erroneous. The Minster Way is a long distance footpath between York Minster and Beverly Minster. A small section runs along the lane called Langwith Stray. It also runs on the bridleways around the Tillmire SSSI as indicated in our response to MM3.51

Spatial Strategy MM3.53 Policy SS13: Land West of Elvington Lane

p.30 (xi) Where this possible school site overlaps with an existing SINC this needs to be highlighted and mitigation procedures listed here including the wording “**for the existing agricultural bird assemblage including granivorous birds whose needs differ from wetlands mitigation.**” See also MM3.51

Spatial Strategy MM3.54 Policy SS13: Land West of Elvington Lane

p.31 (xii) We welcome recognition of the transport and highway impacts of the site. But it is difficult to imagine how “proportionate mitigation” will be achieved for an additional raised GSJ. Primary access ST15 to A64 shown “indicatively” in the LP is very different from the route and detailed designs in EX_HS_P3_M7_EL_8 e.g. Appendix 1, which have not yet been consulted on. CYC’s indicative route appears disingenuous.

The list of sites requiring assessment of cumulative transport and highway impacts is incomplete. **Please add ST4.**

p.31 (xiii) We welcome delivery of a new link road from ST15 to Hull road and note that this, along with “works to the south of Grimston Bar Interchange” will require a very considerable investment.

We would like to suggest an alternative solution which addresses both synergy between neighbouring sites and is closer to the indicative route shown than EX_HS_P3_M7_EL_8.

Please see supporting documentation below.

Spatial Strategy MM3.55 Policy SS13: Land West of Elvington Lane

p.31 (xiv) As discussed at the hearing and agreed verbally by CYC, please see 39:00 to 42:31 on [Phase 4; 13/9/22; Day 5; Matter 7; Transport; PM \(1/3\) – YouTube](#) , that detailed routing of Active Travel is inappropriate at a strategic level. The precise routing of active travel routes to ST15 should be a matter of local decisions at the planning stage. We propose replacing the whole sentence with “**Create safe cycle and pedestrian routes from ST15 to Heslington and the University of York, ensuring no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington**”

Village and to minimise impact on the narrow road traffic routes within and around the village built area.” See also MM3.54

p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided and contrary to MM3.51 (vii). **We suggest deletion point (xv).**

Please see Supporting Documentation below.

[Spatial Strategy MM3.56 Policy SS13: Land West of Elvington Lane](#)

p.32(xvi) Omission Langwith Stray. The original wording “dedicated secure access for existing local residents and landowners” implied all the users. Restoring Langwith Stray to the list upholds this intention.

Also exclude traffic from ST15 to Langwith Stray to

- protect the Tillmire SSSI and wetlands mitigation for Lower Derwent SPA/RAMSAR from traffic emissions
- minimise recreational access to SSSI and in particular dog walkers and mountain bikers in order to maintain the SSSI’s rare fauna and flora
- ensure that Langwith Stray does not become a de facto car park for vehicles coming into it via ST15 causing obstruction for farm machinery, domestic and business users and important services such as emergency vehicles, refuse collection and Ouse and Derwent drainage board.

We suggest amend (xvi) to **“Ensure that vehicular access to connect existing premises only along Common Lane/Long Lane and Langwith Stray to Heslington is retained as part of the wider ST15 access arrangements.”**

[Spatial Strategy MM3.57 Policy SS13 explanation – paragraph 3.64](#)

Additional sentence. **“Public Transport and car access to ST27 will not be via Heslington Village including Low Lane and Ox Close Lane in line with MM3.78 para 3.101”**

The list of sites requiring sustainable transport connections is incomplete. **Please add ST4.**

[Spatial Strategy MM3.58 Policy SS13 explanation – paragraph 3.67](#)

p.32 Again ST4 is not integrated into the traffic planning. Add ST4 **“, ST4 and Elvington Business Park (ST26)”**

Heslington Parish Council does not accept the need for an additional grade separated junction. In place of “The provision of a new grade separated junction onto the A64”, insert **“The provision of access to an upgraded Grimston Bar Interchange for ST4, ST27 and ST15, minimising disruption to existing settlements and the rural setting of York and maximising Active Travel opportunities”**

Please see supporting documentation below.

P.33 Final sentence is ambiguous and needs to be corrected.

[Spatial Strategy MM3.77 Policy SS22: University of York Expansion](#)

p.38 Bullet 1, A landscaped mitigation buffer outside the boundary of ST27 site is unacceptable because

- it is a further loss of food producing BMV land at a time of food insecurity

- the buffer could allow creeping development

- it is contradicted in MM3.78 para 3.98a and 3.99a “the expansion site must provide a landscape buffer”

- and ambiguous in the remainder of 3.99a.

Amend the wording of the first bullet point to **“Create an appropriately landscaped buffer wholly within the site.”** Ensure that subsequent paras in MM3.78 are consistent with this.

bullet 2 typo **change ST5 to ST4**

Bullet 3, **delete** “to the south of the site”

Add **“and ST4”** to both 3 and 4.

Cumulative transport impacts. **Impacts should explicitly include noise and light pollution and loss of BMV land for food production as well as increased congestion, ecological and health harms.**

A junction south of ST27 onto the A64 is not the best plan. We suggest an alternative with fewer problems in our supporting documentation.

Please see Supporting Documentation below.

[Spatial Strategy MM3.78 Policy SS22 Explanation](#)

P39 para 3.98 **Any evidence that this statement is based on should be referenced here.**

Sharing the evidence is important for maintaining "Town and Gown" relations on a mutually beneficial footing as was evident at the Hearings.

p.40 3.98 final deleted sentence. **This sentence should be reinstated and Campus 3 changed to Campus East** in order to encourage student accommodation within the campus, in agreement with MM7.1 p81 policy ED1.

p.41 para 3.100 Add ST4 before ST15 so **“housing allocation at ST4 and ST15...”**

p.41 Para 3.101 HPC welcomes this assurance that there will be no new vehicular access to ST27 and Campus East via Heslington Village including Low Lane and Ox Close Lane. The suggestion of a public transport route via a GSJ on A64 south of Common lane to ST27 (EX-CYC-89) and car access as far as ST27 (ex-hs-p3-m7-el-8-langwith-quod P12) should be **explicitly ruled out.**

Please see Supporting Documentation below.

Education

Education MM 7.1 Policy ED1; University of York

P82 final sentence Facilities for sport etc **Number this (viii)** and add **“Provided the land is not Best and Most Versatile (BMV) land, or in agricultural production, or a mitigation site.”**

The rationale for this is to conserve food production around the conurbation of York and to ensure that mitigation sites are preserved from light and noise pollution from sports facilities. It also reduces the risk of sports facilities on GB sites becoming a precursor to creeping future development into the GB.

Education MM7.3 Policy ED1 explanation- paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e

p.83 7.2d We welcome this modification to protect neighbouring York communities.

Education MM7.4 Policy ED2: Campus West

p.84 **Please add a fourth bullet point** indicating the total number of car parking spaces across the entire university complex ie Campus West, Campus East and the Science Park as well as the proposed number for ST27. This is to indicate the true impact on surrounding infrastructure and local communities.

Education MM7.7 Policy ED3: Campus East

p.86 ED3 change to 23% density restriction, Campus East

The lifting of the 23% restriction on building density on Campus East should be spelt out in the main modifications not left as a note.

CYC have not sufficiently justified allowing both increased density of development and expansion of the University in ST27. We request the strongest possible evidence to support CYC over-ruling the Minister of State decision of 2007 on both the density and the boundaries.

Please see supporting documentation below.

p 87 (iii) p.84 **Please add a fourth bullet point** indicating the total number of car parking spaces across the entire university complex ie Campus West, Campus East and the Science Park as well as the proposed number for ST27. This is to indicate the true impact on surrounding infrastructure and local communities.

Please see Supporting Documentation below.

Green Infrastructure

Green Infrastructure MM9.3 Policy GI2: Biodiversity and Access to Nature

p.100 (v) We support this enhanced protection. It is important that infrastructure is taken account of when planning, particularly transport infrastructure e.g. ST15 to A64 which will impact green belt, veteran native woodland and introduce light, noise and emissions pollution.

For each bullet point (i) to (v) we suggest the phrase “**and its associated infrastructure**” is added after “development”. This would clarify that the impact of the infrastructure on biodiversity may be as great, if not greater than, the development itself and ensure that infrastructure mitigation is not overlooked or down-graded to a secondary consideration.

Delivery and Planning

(NB Awaiting confirmation from CYC of registration of this response)

Delivery and Planning MM15.1 Policy DM1: Infrastructure and Developer Contributions

P131 15.1 It is not sound to plan at a strategic level for unviable developments. We therefore suggest the following addition to the second paragraph in this section as shown below in bold.

“Where developers demonstrate that there are exceptional circumstances, **which had not arisen during the consultation and hearings processes**, which justify the need for a viability assessment at the application stage, the Council will consider the assessment. “

The rationale for this amendment is that doubts expressed previously about viability should not be brought forward as exceptional circumstances by developers.

Supporting Documentation

Supporting Documentation Spatial Strategy MM3.17

The transport and highways impact of the site development should be assessed individually and cumulatively with sites ST27 and ST15. Where necessary, proportionate mitigation will be required. This is consistent with the approach in MM3.20.

Congestion at peak times is already a problem in Heslington (see photo below). Together, the intended developments ST4, ST27, ST15 will send greatly increased traffic through Heslington Parish down Field Lane into Main Street West and University Road as well as into Main Street South to access the facilities there. Coupled with the suggested cycle routes through Heslington from Wheldrake, Elvington, Langwith Garden Village (ST15) and further afield (eg Fulford), the cumulative traffic impact on Heslington from the draft Local Plan is unacceptable. The disruption to Heslington Conservation Area, and to residents and businesses throughout the Parish, would be considerable with inevitable increased congestion and its consequent negative effects. Please see also positive suggestions in Supporting Documentation for Spatial Strategy MM3.17, MM3.54, MM3.58, MM3.77.



Supporting Documentation Spatial Strategy MM3.17, MM3.54, MM3.58, MM3.77

The infrastructure requirements of ST15 are very large, very expensive and very intrusive as well as ecologically damaging. This is agreed by all parties. The suggestion of extensive modification to Elvington Lane, Hull Road and “south of Grimston Bar Interchange” as the secondary access for 30% of dwellings, coupled with the additional costs of the primary access, namely a new raised GSI on the A64 and associated link roads and necessary mitigation, brings the viability of the site into question.

The proposal as it stands is for two huge new road systems involving loss of veteran trees, building roads through BMV agricultural green belt areas, bringing traffic close to the proposed wetland mitigation area (OS10), introducing pollution from light, noise and vehicle emissions affecting ecological systems and humans across a wide area. The proposals discuss the synergy between ST15 and ST27, but have not taken into account the proximity of ST4 and ST27 to Grimston Bar Interchange. We accept that there is not capacity on Grimston Bar Interchange as it stands, but the intention already is to greatly modify access to Elvington Lane and “south of Grimston Bar.” With a much smaller investment, and with far fewer damaging consequences, it should be possible to avoid introducing substantial additional new roads within GB land south of Common Lane, Heslington, while optimising Active Travel routes between ST15 and ST27 and onward.

CYC modelling suggests 25% of travel from ST15 will be to University of York and associated places of work such as the Science Park. 30% of traffic will exit via Elvington Lane. It is reasonable to assume that these will largely not be heading for University of York. In other words, more than 50% of travel will not be via a new GSJ on the A64 according to CYC modelling. Moreover CYC predicts 15% by sustainable transport including Active Travel, plus an expected continuation/increase in working from home (EX-CYC-89 Wood Group Sustainable Transport Report p 11 Principal 5). This leaves probably less than 30% car journeys from ST15 needing to access a new junction on the A64.

We suggest that CYC reviews the access needs of ST15, Campus East, ST27 and ST4 and reconsiders synergies such that a single, coherent road plan, focussed around a modified Grimston bar Interchange with costs shared by the 3 strategic sites, is made. Such a plan will meet the desire of the three strategic sites and Campus East to access A64, better promote Active Travel as the desirable option and avoid damaging local community needs for clean air, freedom of movement and the right to the enjoyment of their property.

For example, a route east from the northern tip of ST15 direct into Campus East is shorter and less disruptive than the proposed link road south of Long Lane. A route from ST4 onto the A64, or via the adjacent Park and Ride site, rather than Field Lane will incur less congestion and related problems for Badger Hill, Heslington and other neighbouring areas. ST27 is very close to the proposed works to the south of Grimson Bar and this could provide the opportunity to create a direct link from University of York to the ring road to the university’s benefit, as well as provide a link to ST15 instead of the proposed further major GSJ south of Common Lane. ST4 would be less dependent on Field Lane (currently planned to be its only access) to the benefit of surrounding communities. The viability of ST15 has been a matter of debate. To reduce the amount of road infrastructure requirements from two huge projects to one huge project shared across 3 sites must be an advantage.

A raised GSJ south of Common Lane and associated link roads, will significantly harm the rural setting of Heslington Village including its Conservation Area as well as bring about an undesirable urbanisation around the perimeter of York. It would undermine the soundness of the plan for economic viability, ecological protection and historic and conservation reasons. Alternatives should be explored as we have described above which would produce a much better joined up and future-proofed transport plan with synergy advantages for all 3 of the strategic sites in Heslington Parish (ST4, ST15 and ST27).

A GSJ south of Common Lane will not encourage Active Travel both because of the ease of car access onto the A64 and because Active Travel routes will be unnecessarily long. It will not create a logical and economical synergy between the infrastructures of the 3 sites. ST4 and ST27 would have no vehicular access to the A64 except via Field Lane and Hull Road, adding to congestion. Along with the associated link routes from ST27 and ST15, it will destroy a large acreage of BMV food producing land. It will be visually and auditorily prominent in an otherwise largely rural landscape. It will impact on the historic setting of York.

Supporting Documentation Spatial Strategy MM 3.51

(v) We welcome the specification of biodiversity protection for Elvington Airfield SINC and the requirement for compensatory measures WITHIN the development site of ST15. The existing assemblage of birds protected by the SINC is not mitigated by OS10 which is for wetland birds. Some bird species, e.g. skylarks, were previously displaced by the development of Campus East. New developments need to be assessed for impact on biodiversity on a time scale that includes cumulative threats over a number of years. See also MM3.53 regarding the future siting of the secondary school.

(vii) The mitigation hierarchy for Heslington Tillmire is problematic and requires further consideration. The Tillmire is one of the few SSSIs within York. It has managed to retain its rare flora and fauna because it is not a through route between settlements and has had very few dog walkers in the area up to now.

The acknowledgement of a need for a barrier to domestic pets is laudable. The requirement of “a buffer of at least 400m from the SSSI” sounds good. But how will either of these be achieved given (a) public rights of way on bridleways run around three sides of the SSSI, including the Minster Way long distance path, and, (b) the promotion in the LP of Active Travel routes on and near the SSSI e.g. in MM3.55(xv) and EX-CYC-89 (report for CYC by Wood Group section 4.3)?

We suggest that the mitigation hierarchy is not fit for purpose because it cannot work with existing rights of way and will be undermined by proposed Active Travel routes on and near the SSSI as well as the development of a very large settlement easily within dog-walking distance of the SSSI. These contradictions between protection and access need to be resolved and a workable means of protecting the Tillmire identified. The LP as it stands will inevitably bring recreational disturbance to a highly sensitive area identified as important by its SSSI status.

Supporting Documentation Spatial Strategy MM3.55

(xiv) Heslington PC and individual residents have previously expressed their concerns about this promotion of mixed pedestrian, vehicle and cycle usage on very narrow rural lanes for nearly 3 miles which are trafficked by heavy machinery. See also EXCYC89 Wood Group Sustainable Transport Study p38 "Although it has very low traffic flows, Long Lane/Common Lane is currently a poor cycling environment due to its narrowness and permitted speed limit of 60mph." Numerous farming and other businesses such as Livery Yards and fishing lakes are based in the area as well as existing residents. Large farm plant, large lorries delivering or carrying out heavy goods, delivery lorries and the normal traffic for residents, makes this a hazardous route for cycling, as illustrated below.

COMMON LANE



LONG LANE



LANGWITH STRAY



LOW LANE



p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided. The SSSI is for ground nesting birds and heathland vegetation. Encouraging cyclists through the area is contrary to previous statements re mitigation hierarchies, limiting access, protective barriers to people and pets (MM3.51 vii). Occasional mountain bikers that use these routes now are only just acceptable in terms of cycling off the bridleways and /or, widening the erosion of the bridleway to avoid marshy land. It does not seem likely that other cyclists and walkers, in far larger numbers, will be more inclined to be restricted to pathways. Please see also supporting documentation for our response to MM 3.51 (vii) copied here.

Supporting Documentation Spatial Strategy MM3.78

P39 para 3.98 The independent evidence for the benefits of co-location needs to be referenced for transparency, especially in the light of changes to working practice post pandemic (see EX-CYC-89 Wood Group Sustainable Transport Report p 11, Principal 5). Sharing the evidence is important for maintaining "Town and Gown" relations on a mutually beneficial footing as was evident at the Hearings.

p.41 para 3.100 Consider synergies with ST4 lying adjacent to Campus East for traffic access from Grimston Bar in order to minimise congestion on Field Lane through Heslington. See also MM3.17 response and supporting documentation and MM3.54, MM3.58, MM3.77 Supporting Documentation which suggests a coherent plan for access to A64 from all 3 sites in Heslington Parish and avoiding the need for a GSJ south of ST27.

Supporting Documentation Education MM7.7

The proposal to both expand Campus East beyond the boundaries approved by the Minister of State 2007, and also to remove the density percentage restriction, can only be seen as dishonourable behaviour by CYC and the University of York. Heslington and other neighbouring communities have appealed for Campus East to be kept within its original bounds. If expansion is proven to be necessary (and we await the independent evidence for this, see MM3.78), we ask CYC to review the percentage density restriction, in the first instance, before allowing other more damaging changes. While we do not welcome an increased density of development on Campus East, in practice urbanisation within the site is a fact. The expansion of the total area of the site is far more damaging, would add to urban sprawl and impact directly on the quality of life, and right to enjoyment of their property, of existing York residents.