



## Notice of a public meeting of

### Local Plan Working Group

- To:** Councillors Ayre (Chair), Steward (Vice-Chair), Aspden, N Barnes, Brooks, Cuthbertson, D'Agorne, Gates, Lisle, Looker, Reid, Warters, Williams and K Taylor
- Date:** Wednesday, 27 February 2019
- Time:** 5.30pm
- Venue:** The Snow Room - Ground Floor, West Offices (G035)

### AGENDA

#### 1. **Declarations of Interest**

At this point in the meeting, Members are asked to declare:

- any personal interests not included on the Register of Interests
- any prejudicial interests or
- any disclosable pecuniary interests

which they may have in respect of business on this agenda.

#### 2. **Minutes** (Pages 1 - 4)

To approve and sign the minutes of the meeting of the Local Plan Working Group held on 18 December 2018.

#### 3. **Public Participation**

At this point in the meeting, members of the public who have registered their wish to speak, regarding an item on the agenda or an issue within the remit of the Working Group, may do so. The deadline for registering is **5.00pm on Tuesday 26 February 2019**.

#### **Filming or Recording Meetings**

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[http://www.york.gov.uk/download/downloads/id/11406/protocol\\_for\\_webcasting\\_filming\\_and\\_recording\\_of\\_council\\_meetings\\_20160809.pdf](http://www.york.gov.uk/download/downloads/id/11406/protocol_for_webcasting_filming_and_recording_of_council_meetings_20160809.pdf)

**4. Earswick Neighbourhood Plan Examiner's Report** (Pages 5 - 116)

This report asks Members to recommend to Executive to agree the Examiner's recommendations to enable the Neighbourhood Plan to proceed to Referendum.

**5. York Local Plan Update** (Pages 117 - 474)

The purpose of this report is to update Members on the Local Plan examination including additional technical evidence regarding the Objective Assessment of Housing Need (OAN) which was submitted to the Planning Inspectorate (PINS) on 29 January 2019 following approval by the Corporate Director of Economy and Place in consultation with relevant Members in accordance with the delegated authority from Council.

**6. Urgent Business**

Any other business which the Chair considers urgent under the Local Government Act 1972.

Democracy Officer:

Name: Laura Clark

Contact Details:

- Telephone – (01904) 552207
- E-mail – [laura.clark@york.gov.uk](mailto:laura.clark@york.gov.uk)

For more information about any of the following please contact the Democracy Officer responsible for servicing this meeting:

- Registering to speak
- Business of the meeting
- Any special arrangements
- Copies of reports and
- For receiving reports in other formats

Contact details are set out above.

**This information can be provided in your own language.**

我們也用您們的語言提供這個信息 (Cantonese)

এই তথ্য আপনার নিজের ভাষায় দেয়া যেতে পারে। (Bengali)

Ta informacja może być dostarczona w twoim (Polish)  
własnym języku.

Bu bilgiyi kendi dilinizde almanız mümkündür. (Turkish)

یہ معلومات آپ کی اپنی زبان (بولی) میں بھی مہیا کی جاسکتی ہیں۔ (Urdu)

 (01904) 551550

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City Of York Council

Committee Minutes

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Meeting	Local Plan Working Group
Date	18 December 2018
Present	Councillors Ayre (Chair), Steward (Vice-Chair), Aspden, Cuthbertson, D'Agorne, Gates, Lisle, Looker, Reid, Williams and Doughty (Substitute for Councillor Brooks)
Apologies	Councillors N Barnes, Brooks, Warters and K Taylor

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**28. Declarations Of Interest**

Members were asked to declare, at this point in the meeting, any personal interests not included on the Register of Interests, or any prejudicial or disclosable pecuniary interests they might have in respect of the business on the agenda. None were declared.

**29. Minutes**

Resolved: That the minutes of the meeting held on 20 September 2018 be approved as a correct record and then signed by the Chair.

**30. Public Participation**

It was reported that there had been no registrations to speak under the Council's Public Participation Scheme.

**31. Rufforth With Knapton Neighbourhood Plan**

Members considered a report that highlighted the results of the Rufforth with Knapton Neighbourhood Plan referendum and asked them to recommend to Executive to formally 'make' the Neighbourhood Plan and bring it into full legal force as part of the Development Plan for York. Members noted that this would allow the Neighbourhood Plan to progress in line with the relevant Neighbourhood Planning legislation and Regulations and that this paper would be considered by the Executive on 20 December 2018.

Officers gave an update and informed Members that the Localism Act 2011 introduced new powers for community groups to prepare neighbourhood plans for their local areas and that the Council had a statutory duty to assist communities in the preparation of Neighbourhood Plans including the process of Examination and Referendum.

Members noted that the Rufforth with Knapton Neighbourhood Plan had been prepared by the Rufforth with Knapton Neighbourhood group with on going engagement with the local community and City of York Council. It had been through various stages of preparation where the Examiners Report concluded that subject to modifications the plan met the necessary basic conditions and subject to some modifications should proceed to referendum. A referendum was held on Tuesday 20 November 2018, where 93% of the votes were in favour of the neighbourhood plan.

Members noted that once the plan was 'made', it would achieve its full legal status and form part of the statutory development plan for the area and would sit alongside the Local Plan (once adopted).

Members thanked all of those involved with the neighbourhood plan and commented on the high turnout at the referendum.

Resolved:

- i. That the results of the referendum be considered and a recommendation to Executive to formally 'make' the Neighbourhood Plan on 20 December 2018 be agreed.
- ii. That a recommendation to Executive to approve the Decision Statement attached at Annex B to be published in accordance with Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended) be agreed.

Reasons:

- i. To allow the Neighbourhood Plan to progress in line with the Neighbourhood Planning Regulations.

- ii. To allow the Neighbourhood Plan to progress in line with Neighbourhood Planning Legislation.

### **32. Urgent Business**

Officers informed Members that a letter had been received from the inspector in relation to the submitted Local Plan. This was to indicate their intention to move forward into hearings in early 2019. This letter would be published on the website shortly.

In response to Members questions Officers stated that:

- There was a statutory requirement to give 6 weeks notice of the hearings and some technical work to be undertaken beforehand;
- A more detailed timetable would follow shortly;
- Detailed Matters, Issues and Questions from the inspector, along with the Council's responses, would also be published online ahead of the hearings; and
- Venues for the hearings were being considered now that a timeframe had been identified.

Cllr N Ayre, Chair

[The meeting started at 4.00 pm and finished at 4.15 pm].

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**Local Plan Working Group****27 February 2019**

Report of the Corporate Director for Economy and Place

Portfolio of the Executive Member for Transport and Planning

**Earswick Neighbourhood Plan – Examiner’s Report****Summary**

1. The Earswick Neighbourhood Plan Examiner’s Report is attached at Annex A to this report. Annex B sets out a Decision Statement which includes the Council’s proposed response to the Examiner’s recommended modifications. This report asks Members to recommend to Executive to agree the Examiner’s recommendations to enable the Neighbourhood Plan to proceed to Referendum.

**Recommendations**

2. Members are asked to recommend that Executive:
  - i) Agree the Examiner’s modifications set out at Annex B to the Earswick Neighbourhood Plan and that subject to those changes the Plan meets the Basic Conditions and other legislative requirements.

Reason: To allow the Neighbourhood Plan to progress in line with neighbourhood planning legislation.

- ii) Agree that the Earswick Neighbourhood Plan as amended proceeds to a local referendum based on the geographic boundary of the parish of Earswick as recommend by the Examiner.

Reason: To allow the Neighbourhood Plan to progress in line with neighbourhood planning legislation.

- iii) To approve the Decision Statement attached at Annex B to be published on the City of York Council’s website.

Reason: To allow the Neighbourhood Plan to progress in line with neighbourhood planning legislation.

## Background

3. The Localism Act 2011 introduced new powers for community groups to prepare neighbourhood plans for their local areas. The Council has a statutory duty to assist communities in the preparation of Neighbourhood Plans and to take plans through a process of Examination and Referendum. The local authority is required to take decisions at key stages in the process within time limits that apply, as set out in the Neighbourhood Planning (General) Regulations 2012 as amended in 2015 and 2016 (“the Regulations”).
4. The Earswick Neighbourhood Plan has been prepared by Earswick Parish Council with on-going engagement with the local community and City of York Council. Prior to Examination it has been through the following stages of preparation:
  - Designation as a Neighbourhood Area (9<sup>th</sup> December 2015)
  - Consultation on 1<sup>st</sup> Pre-Submission Version (20<sup>th</sup> November 2016 to 7<sup>th</sup> January 2017)
  - Consultation on 2<sup>nd</sup> Pre-Submission Version (4<sup>th</sup> December 2017 to 5<sup>th</sup> February 2018)
  - Submission to City of York Council (5<sup>th</sup> February 2018)
  - Submission Consultation (4<sup>th</sup> October to 15<sup>th</sup> November 2018)
5. Following the close of Submission consultation and with the consent of the Parish Council, Mr Andrew Ashcroft BA (Hons) MA, DMS, MRTPI was appointed to undertake an Independent Examination of the Neighbourhood Plan. The purpose of the Examination is to consider whether the Plan complies with various legislative requirements and meets a set of “Basic Conditions” set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. The Basic Conditions are:
  - i) To have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - ii) To contribute to the achievement of sustainable development;
  - iii) To be in general conformity with the strategic policies contained in the development plan for the area;
  - iv) To not breach, and be otherwise compatible with, EU and European convention on Human Rights obligations; and

- v) To be in conformity with the Conservation of Habitats and Species Regulations 2017(3).
6. The Examiner can make one of three overall recommendations on the Neighbourhood Plan namely that it can proceed to referendum (i) with modifications; (ii) without modification; or (iii) that the Plan cannot be modified in a way that allows it to meet the Basic Conditions or legal requirements and should not proceed to referendum.
  7. Modifications can only be those that the Examiner considers are needed to:
    - a) make the plan conform to the Basic Conditions
    - b) make the plan compatible with the Convention rights
    - c) make the plan comply with definition of a neighbourhood plan and the provisions that can be made by a neighbourhood plan or
    - d) to correct errors.
  8. If a recommendation to go to a referendum is made, the Examiner must also recommend whether the area for the referendum should go beyond the Neighbourhood Area, and if so what the extended area should be.
  9. The Regulations presume that Neighbourhood Plans will be examined by way of written evidence only, with a requirement for a hearing only in cases where the Examiner feels the only way to properly assess a particular issue is via a discussion with all parties. The Examiner decided that examination by written representations was appropriate in this case and provided his final report on 7<sup>th</sup> January 2019.
  10. Overall, the Report concluded that “Subject to a series of recommended modifications set out in this report I have concluded that the Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum”.

### **Examiner’s Recommendations**

11. Annex A and B set out all of the Examiner’s detailed and consequential minor modifications to the Neighbourhood Plan.
12. The majority of modifications were minor however the examiner did include a key point in relation to the Green Belt.

13. Modifications were suggested by the examiner in relation to Policy ENP4: Green Belt to reflect the policy context of York's Green Belt. The Examiner recommends that the neighbourhood plan continues to apply the approach to the identification of the Green Belt as set out currently in the saved policies relating to Green Belt in the revoked RSS and the Fourth Set of Changes Development Control (draft) York Local Plan (2005) on an interim basis until such times as the emerging Local Plan is adopted. The Earswick Neighbourhood Plan does not seek to allocate any sites within the general extent of Green Belt as per the saved RSS policies. The examiner concludes that this will ensure that the preparation of the emerging Local Plan is used as the mechanism for the detailed identification of the York Green Belt boundaries in accordance with national planning policy.

### **Next Steps**

14. The next stage of the relevant legislation requires the Council to:
  - Consider each of the recommendations made by the Examiner's Report (and the reasons for them), and
  - Decide what action to take in response to each recommendation.
15. If the LPA is satisfied that the Neighbourhood Plan meets the Basic Conditions, is compatible with the Convention rights, and complies with the definition of an NP and the provisions that can be made by a NP or can do so if modified (whether or not recommended by the Examiner), then a referendum must be held.
16. The Council must publish its decision and its reasons for it in a 'Decision Statement'. The Decision Statement must be published within 5 weeks beginning with the day following receipt of the Examiner's Report unless an alternative timescale is agreed with the Parish Council. The March 7<sup>th</sup> Executive date is more than 5 weeks from the receipt of the examiners report (7<sup>th</sup> January 2019) however the Parish Council has agreed this alternative timescale in writing.
17. The Examiner's recommendations on the Neighbourhood Plan are not binding on the Council, who may choose to make a decision which differs from the Examiner's. However, any significant changes from the Examiner's recommendations would require a further period of public consultation, along with a statement from the Council setting out why it has taken this decision.



18. A decision to refuse the Neighbourhood Plan proposal could only be made on the following grounds:
- the LPA is not satisfied that the Neighbourhood Plan meets the Basic Conditions;
  - the LPA does not believe that with modification Neighbourhood Plan can meet the Basic Conditions;
  - the LPA considers that the Neighbourhood Plan constitutes a repeat proposal; or
  - the LPA does not believe the qualifying body is authorised or
  - that the proposal does not comply with that authorisation.
19. The Examiner's Report concludes that the Neighbourhood Plan meets the Basic Conditions required by legislation, and that subject to the modifications proposed in his report, the Neighbourhood Plan should proceed to a referendum to be held within the Neighbourhood Area. Officers have considered all of the recommendations and the Examiner's reasons for them and have set out the Council's response as part of the Decision Statement in Annex B.
20. It is recommended that all of the Examiner's recommended modifications be made as set out in Table 1 at Annex B. The Officer recommendation is that subject to those modifications the Plan meets the Basic Conditions, is compatible with the Convention Rights and complies with the provisions that can be made by a neighbourhood plan. Subject to the Executive's agreement of the Decision Statement, the Neighbourhood Plan will be amended accordingly and the Neighbourhood Plan will proceed to local referendum.

### **Referendum**

21. The Council must organise a referendum on any Neighbourhood Plan that meets the legislative requirements. This ensures that the community has the final say on whether a Neighbourhood Plan comes into force.
22. The Examiner's Report confirms that the referendum area should be the same as the Neighbourhood Area designated by the Council, which is the parish of Earswick. The Neighbourhood Planning (Referendum) Regulations 2012 as amended require the Local Planning Authority to hold the referendum within 56 days of the date that a decision to hold

one has been made. In this case, the decision whether to hold a referendum will be made at Executive on 7<sup>th</sup> March 2019. Assuming the Executive endorse the recommendations in this report, it is anticipated that the referendum will be held on or before 30<sup>th</sup> May 2019, within the 56 day period set out in the amended Regulations. The date for the referendum and further details will be publicised once a date is set by the Council. This is currently being discussed with colleagues in Electoral Services.

23. If over 50% of those voting in the referendum vote in favour of the Neighbourhood Plan, then under the legislation the Council must bring it into force within 8 weeks of the result of referendum (unless there are unresolved legal challenges). If the referendum results in a “yes” vote a further report will be brought to Executive with regard to the formal adoption of the Neighbourhood Plan as part of the statutory Development Plan.

### **Decision making**

24. As the Plan is now at an advanced stage, its policies where relevant have legal weight in decision making with regard to any planning applications to be determined within the Earswick parish. This is reflected in The Neighbourhood Planning Act 2017 which recognises that, when determining an application, a LPA must have regard to “a post examination draft neighbourhood development plan as far as material to the application”. If a LPA make a decision to allow a draft neighbourhood plan with modifications to proceed to referendum, then the modifications recommended must also be taken into account.

### **Consultation**

25. As mentioned earlier in the report, the Earswick Neighbourhood Plan has been through several stages of consultation. These are: consultation on designation as a Neighbourhood Area (9<sup>th</sup> December 2015), consultation on the 1<sup>st</sup> Pre-Submission version of the Plan (20<sup>th</sup> November 2016 to 7<sup>th</sup> January 2017), Consultation on 2<sup>nd</sup> Pre-Submission Version (4<sup>th</sup> December 2017 to 5<sup>th</sup> February 2018) consultation on a Submission version (4<sup>th</sup> October to 15<sup>th</sup> November 2018).
26. A Consultation Statement accompanied the submission version of the Neighbourhood Plan and sets out all the consultation undertaken. All the consultation undertaken by City of York Council has been carried

out in accordance with the Council's Statement of Community Involvement.

## Options

27. Officers request that Members recommend to Executive that they:
- i) endorse the recommendations in paragraph 1 of this report and agree with the Examiner's Recommendations and approve the Decision Statement attached at Annex B to enable the Earswick Neighbourhood Plan to proceed to Referendum.

## Analysis

28. The Examiner has concluded that the modifications will satisfy the Basic Conditions, the Council has an obligation, under Schedule 4B of the 1990 Town and Country Planning Act, to arrange a local referendum, unless the Examiner's recommended modifications and/or conclusions are to be challenged. The Officer recommendation to Members is that the modifications made by the Examiner are well justified and that, with these modifications, the Neighbourhood Plan proposals will meet the legislative requirements. The Council must organise a referendum on any Neighbourhood Plan that meets the legislative requirements. This will give the local community the opportunity to vote on whether they deem the Neighbourhood Plan to meet the needs and aspirations for the future of their neighbourhood.

## Alternative Options and Reasons for Rejection

29. The following alternative options have been identified and rejected for the reasons as set out below
- ii) *That Members recommend to Executive that they provide modified recommendations to those made by the Examiner and, if considered to be significant, agree that these will be subject to further consultation along with a statement explain why the decision differs from the Examiner's;*

*This option is not considered appropriate as the proposed modifications make the Neighbourhood Plan more robust and enable it to meet the Basic Conditions.*

- iii) *That Members recommend to Executive that they reject the Examiner's recommendations and refuse the Neighbourhood Plan*

*proposal. This decision can only be justified on the grounds listed under paragraph 17.*

*This option can only be justified if the Examiner recommends that the Plan should not proceed to a referendum, or the Council is not satisfied that the plan has met the procedural and legal requirements. This option is not considered appropriate.*

## **Financial Implications**

30. The responsibility and therefore the costs of the Examination and Referendum stages of the Neighbourhood Plan production lie with the City of York Council. Table 1 below sets out a breakdown of the non-staffing costs of producing the Earswick Neighbourhood Plan to date and also sets out the approximate costs associated with the Examination and Referendum.

**Table 1**

<b>Stage</b>	<b>Cost</b>
Designation consultation	£500
Submission consultation	£500
NP grant to Parish Councils	£3,000
Examination	£5,580
Referendum	Circa £5,000 (tbc)
<b>Total</b>	<b>£ 14,580</b>

31. There is also a significant level of officer costs required throughout the process to provide the required support to each of the Neighbourhood Planning Bodies. A significant level of officer input at an appropriate level is needed throughout the process to ensure legal conformity, appropriate plan content, technical advice, including provision of mapping and assistance with Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA).
32. Financial support from Central Government is available for Local Planning Authorities (LPAs) involved with Neighbourhood Plans. Some LPAs can claim £5,000 for the designation of neighbourhood areas.

Whilst this was claimed for the designation of the Earswick Neighbourhood Plan in 2015, it is no longer available for neighbourhood areas in York as more than 5 neighbourhood areas are designated. LPAs can also claim £20,000 once they have set a date for a referendum following a successful examination.

33. Earswick Parish Council was provided with a £3k grant from the Council to support the development of the neighbourhood plan.
34. Communities with Neighbourhood Plans in place can also benefit financially should York adopt a Community Infrastructure Levy (CIL). They can benefit from 25% of the revenues from the CIL arising from the development that takes place in their area.

## Implications

35. The following implications have been assessed:

- **Financial**– The examination and referendum will be funded by City of York Council. Once a date for the referendum is set the Council can apply for a government grant of £20,000 towards the costs of the Councils involvement in preparing the Plan (including the costs of the Examination and referendum). Any shortfall will need to be accommodated within existing resource.
- **Human Resources (HR)** - none
- **One Planet Council / Equalities** - Better Decision Making Tool attached at Annex D.
- **Legal** - The Legal implications are set out within the body of this report. The decision to proceed to referendum is, like all decisions of a public authority, open to challenge by Judicial Review. The risk of any legal challenge to the Neighbourhood Plan being successful has been minimised by the thorough and robust way in which it has been prepared and tested.
- **Crime and Disorder** - None
- **Information Technology (IT)** None
- **Property** - None
- **Other** – None

## Risk Management

36. In compliance with the Council's risk management strategy, the main risks associated with the Earswick Neighbourhood Plan are as follows:

- Risks arising from failure to comply with the laws and regulations relating to Planning and the SA and Strategic Environmental Assessment processes and not exercising local control of developments.

## Contact Details

<b>Author:</b>		<b>Chief Officer Responsible for the report:</b>	
<b>Anna Pawson</b> <b>Development Officer</b> <b>Strategic Planning</b> 01904 553312		<b>Mike Slater</b> <b>Assistant Director of Transport and Planning</b>	
<b>Report Approved</b>	✓	<b>Date</b>	19.02.2019
<b>Specialist Implications Officer(s)</b> List information for all			
Financial Implication: Patrick Looker Finance Manager 01904 551633		Legal Implication: Sandra Branigan Senior Solicitor 01904 551040	
<b>Wards Affected:</b>			<b>Strensall</b>
<b>For further information please contact the author of the report</b>			

## Background Papers:

[https://www.york.gov.uk/info/20051/planning\\_policy/1747/earswick\\_neighbourhood\\_plan](https://www.york.gov.uk/info/20051/planning_policy/1747/earswick_neighbourhood_plan)

## **Annexes**

- Annex A Earswick Neighbourhood Plan Examiner's Report
- Annex B Decision Statement
- Annex C Earswick Neighbourhood Plan (Submission version)
- Annex D Better Decision Making Tool

## **List of Abbreviations Used in this Report**

- BA (Hons) MA, DMS, MRTPI – Bachelor of Arts, Masters, Diploma in Management Studies, Member of the Royal Town Planning Institute.
- CIL - Community Infrastructure Levy
- EU – European Union
- HRA – Habitats Regulation Assessment
- LPA – Local Planning Authority
- NP – Neighbourhood Plan
- SEA – Strategic Environmental Assessment

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# **Earswick Parish Neighbourhood Development Plan 2017-2037**

**A report to the City of York Council on the Earswick  
Parish Neighbourhood Plan**

**Andrew Ashcroft  
Independent Examiner  
BA (Hons) MA, DMS, MRTPI**

**Director – Andrew Ashcroft Planning Limited**

### **Executive Summary**

- 1 I was appointed by the City of York Council in October 2018 to carry out the independent examination of the Earswick Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 29 November 2018.
- 3 The Plan proposes a series of policies and seeks to bring forward positive and sustainable development in the plan area. Its focus is on retaining the status and role of the York green belt. It also includes positive policies for the natural and built environment. It proposes the designation of a series of local green spaces.
- 4 The Plan has been significantly underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood plan area.

**Andrew Ashcroft**  
**Independent Examiner**  
**7 January 2019**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Earswick Neighbourhood Plan 2017-2037 ('the Plan').
- 1.2 The Plan has been submitted to the City of York Council (CYC) by Earswick Parish Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework in 2012 and which continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It seeks to be complementary to the emerging City of York Local Plan (2017-2033).
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the plan area and will sit as part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by CYC, with the consent of the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both CYC and the Parish Council. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

### *The Basic Conditions*

- 2.5 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
  - contribute to the achievement of sustainable development; and
  - be in general conformity with the strategic policies of the development plan in the area; and
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

I have examined the submitted Plan against each of these basic conditions, and my conclusions are set out in Sections 6 and 7 of this report. I make specific comments on the fourth and fifth bullet point above in paragraphs 2.6 to 2.11 of this report.

- 2.6 Since February 2015 the Neighbourhood Plan regulations require one of two reports to be an integral part of a neighbourhood plan proposal. Either an environmental

report should be submitted or a determination from the responsible body (in this case CYC) that the Plan is not likely to have significant environmental effects.

- 2.7 In order to comply with the Basic Condition relating to European obligations the Parish Council and CYC have carried out screening exercises on the need or otherwise for strategic environmental assessment. The screening report is detailed and well-constructed. It concludes that the plan is unlikely to have significant environmental effects and that SEA is not required. It helpfully reproduces the responses received from the consultation bodies. I am satisfied that the correct processes have been followed in this regard.
- 2.8 At the same time a Habitat Regulations Screening Report (February 2018) was produced. It assesses whether there are likely to be any significant effects on the qualifying features of European sites as a result of the policies in the submitted Plan that would necessitate the production of a full Habitat Regulations Assessment. In doing so the screening report considered the effects of the submitted Plan on the following European sites: the Earswick Meadows SINC and the River Foss Corridor Site of Local Interest in the neighbourhood area and Strensall Common SAC outside the neighbourhood area. Other non-designated, local interest sites were also taken into account. All the proposed policies and site allocations in the submitted Plan were appraised against the features and vulnerabilities of the identified sites. Cumulative effects are also considered to understand whether the Plan would be likely to have significant effects in combination with other plans or programmes. The report concludes that none of the policies in the Plan are likely to have any significant effects on the identified European sites. In addition, no cumulative effects are identified. The Screening Report is very thorough and provides the appropriate assurances that this important matter has been properly addressed.
- 2.9 The Habitats Regulations Assessment Screening Report was produced in good faith at that time. Since that time a case in the European Court (People Over Wind and Peter Sweetman, April 2018) has changed the basis on which competent authorities are required to undertake habitats regulations assessments. CYC has given this matter due consideration and has produced an updated report. It comments about the significance of the identified sites and ongoing assessment work on the emerging Local Plan. In this context CYC concluded that the recent Sweetman judgement does not affect the integrity of its early screening work on this important matter. I am satisfied that full and proper attention has been given to this issue.
- 2.10 Having reviewed the information provided to me as part of the examination I am satisfied that a thorough, comprehensive and proportionate process has been undertaken in accordance with the various regulations. The various reports set out a robust and compelling assessment of the relevant information. They have been prepared and presented in a very professional fashion. The Habitat Regulations Screening Report and its recent update are particularly impressive. None of the statutory consultees have raised any concerns with regard to either the neighbourhood plan or to European obligations. In the absence of any evidence to the contrary I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.

2.11 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Other examination matters*

2.12 In examining the Plan I am also required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.13 Having addressed the matters identified in paragraph 2.12 of this report I am satisfied that all of the points have been met subject to the contents of this report.

### 3 Procedural Matters

- 3.1 In undertaking this examination I have considered the following documents:
- the submitted Plan.
  - the Basic Conditions Statement.
  - the Consultation Statement.
  - the Strategic Environmental Assessment.
  - the Habitats Regulations Screening Report.
  - the CYC addendum to the HRA Screening Report (August 2018)
  - the representations made to the Plan.
  - the responses of the Parish Council to the Clarification Note.
  - the saved elements of the Regional Strategy for Yorkshire and Humber.
  - the City of York Draft Local Plan incorporating the Fourth Set of Changes Development Control Local Plan (April 2005).
  - the submitted City of York Local Plan 2017-2033.
  - the National Planning Policy Framework (March 2012).
  - Planning Practice Guidance (March 2014 and subsequent updates).
  - Relevant Ministerial Statements.
- 3.2 I carried out an unaccompanied visit to the Plan area on 29 November 2018. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My site inspection is covered in more detail in paragraphs 5.9 to 5.16 of this report.
- 3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised CYC of this decision early in the examination process.
- 3.4 On 24 July 2018 a revised version of the NPPF was published. Paragraph 214 of the 2018 NPPF identifies transitional arrangement to address these circumstances. It comments that plans submitted before 24 January 2019 will be examined on the basis of the 2012 version of the NPPF. I have proceeded with the examination on this basis. All references to paragraph numbers within the NPPF in this report are to those in the 2012 version.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Parish Council has prepared a Consultation Statement. This statement is both detailed and proportionate to the Plan area and its range of policies. It also provides specific details on the consultation process that took place on the two pre-submission version of the Plan. The Statement helpfully sets out how the emerging plan took account of the various comments and representations. Within the context of the extensive details contained within the Statement its paragraph 3.4 underpins the ethos of the consultation process (and the resulting Consultation Statement). It describes the early and full engagement process, holding events at critical times, providing timely feedback and approaching consultation in an open, honest and transparent way. In working to these ideals, the Parish Council has delivered best practice in this important aspect of the plan-making process.
- 4.3 Section 5 of the Statement sets out details of the wider consultation events that has been carried out as part the evolution of the Plan. Details are provided about:
- The use of letter drops and leaflets to all households;
  - The use of a website and a dedicated e-mail address;
  - The use of public meetings;
  - The use of notices and posters;
  - The use of two community questionnaires;
  - The organisation of five community drop in events throughout the plan making process; and
  - Ongoing engagement with CYC in general, and on the emerging Local Plan in particular.
- 4.4 The Consultation Statement provides very useful information on the consultation exercise on two pre-submission version of the Plan organised in November 2016/January 2017 and December 2017/February 2018. Sections 8 and 9 helpfully summarise all the comments received and the extent to which they were addressed in the submission Plan.
- 4.5 It is clear that consultation has been an important element of the Plan's production. Whilst the process has been lengthy by involving two pre-submission versions of the Plan this has taken account of the emerging Local Plan. It has also contributed to the overall robustness of the submitted plan. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. Consultation and feedback have been at the heart of the Plan throughout the various stages of its production.



- 4.6 Consultation and engagement has been maintained into the submission phase of the Plan. This is reflected in the limited number of representations received to the submitted plan (see 4.8 below).
- 4.7 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive and comprehensive approach to seeking the opinions of all concerned throughout the process. There is a very clear and transparent relationship between the consultation process and the Plan itself. CYC has carried out its own assessment to the extent that the consultation process has complied with the requirements of the Regulations.

*Representations Received*

- 4.8 Consultation on the submitted plan was undertaken by the City Council for a six-week period and which ended on 15 November 2018. This exercise generated comments from various persons and organisations as follows:
- Bellway Homes
  - City of York Council
  - Coal Authority
  - Highways England
  - Historic England
  - Martin and Deborah Lumley-Holmes
  - Trevor Beaumont
  - Nick Frieslaar
  - North Yorkshire County Council
  - Natural England

## 5 The Plan Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The Plan area covers the parish of Earswick. Its population in 2011 was 876 persons living in 346 houses. It was designated as a neighbourhood area on 9 December 2015. The neighbourhood area is located to the immediate north of York. A significant proportion of its area is rural in character and is largely in agricultural use.
- 5.2 The neighbourhood area is particularly sensitive. In addition to its proximity to the northern extent of the York built-up area to the south it is well-connected to the York Ring Road (A1237) to the immediate south of the village. The area lies within the general extent of the York Green Belt. The village of Earswick is located in the south western corner of the neighbourhood area. The village sits within the setting of the River Foss to the west
- 5.3 Earswick accounts for the majority of the population of the neighbourhood area. As the plan helpfully describes in Section 2 it was originally a collection of farm buildings which has evolved into a village. This transition accelerated significantly in the last 60 years. As the Plan comments in paragraphs 55 and 56 the development of houses in Shilton Garth Close, Stablers Walk and Rowley Court and then in the Fosslands estate has resulted in a doubling of the size of the village. These phases of development remain clear within the urban form of the village. The Fosslands estate is characterised by its green spaces in general, and that to its west running down to the River Foss in particular.

### *Development Plan Context*

- 5.4 The development plan context is both complex and unusual. The development plan consists of two saved policies from the Regional Spatial Strategy for Yorkshire and Humber as follows:
- Policy YH9: Green Belts – the definition of the inner boundaries of the Green Belt around York
- Policy Y1: York sub area – the definition of detailed boundaries of the outstanding sections of the green belt and the inner boundary and the protection and enhancement of the historical and environment character of York
- These saved policies will apply in the neighbourhood area until they replaced by the emerging City of York Local Plan.
- 5.5 The CYC does not have a formally adopted Local Plan. The City of York Draft Local Plan incorporating the Fourth Set of Changes Local Plan (April 2005) was approved for development management purposes. Its policies are capable of being material planning considerations in the determination of planning applications where policies relevant to the application are consistent with those in the NPPF. This has proved to be particularly useful in the application of Green Belt policy.

- 5.6 The Basic Conditions Statement highlights the policies in the development plan and how they relate to policies in the submitted Plan. This is good practice. It also explains the complicated context within which the neighbourhood plan has been prepared
- 5.7 The emerging City of York Local Plan (2017-2033) was making good progress at the time of this examination. It was submitted for its own examination in May 2018. Since July CYC has been responding to initial matters raised by the appointed Planning Inspectors. Hearings related to housing need, the Duty to Cooperate and Green Belt principles are due to take place in the early part of this year.
- 5.8 The submitted Plan has been designed to run concurrently with (and slightly beyond) the emerging York Local Plan. This follows important national advice in Planning Practice Guidance.

#### *Site Visit*

- 5.9 I carried out an unaccompanied visit to the neighbourhood area on 29 November 2018. I approached the area along the A1237 from the south. This helped me to understand its strategic position within the City area in general, and its position within the Green Belt in particular.
- 5.10 I initially looked around Earswick. I walked along the road called Earswick Village down to the River Foss and then over the footbridge to the west bank of the river. I stretched my legs as I walked back to the A1237. This helped me to understand how the neighbourhood area sits in its wider landscape setting. I then traced my steps back to the village.
- 5.11 I then walked around Stablers Way, Rowley Court and Shilton Garth Close. I saw that the houses were well-maintained and had largely retained their original design integrity.
- 5.12 I then looked around the Earswick Chase development. In doing so I saw the Village Hall and the very impressive Scented Garden. It remained closed following the long hot Summer. In these circumstances it had helpfully received a much-welcome spell of rain earlier that morning.
- 5.13 Throughout my visit I looked at the proposed local green spaces in the village. A key element of their attractiveness was their connectivity to the village in general, and with each other in particular. They were being enjoyed by a series of local residents walking their dogs.
- 5.14 I then took the opportunity to drive to Strensall to the north of the neighbourhood area so that I could see its setting in that direction. In returning to the neighbourhood area I drove along Towthorpe Moor Lane to the Golf Range. This helped me to form a fuller understanding of the significance of the Green Belt in the eastern part of the neighbourhood area.

- 5.15 In order to get a full impression of the Plan area I walked along several footpaths that run to the east of Strensall Road. This gave me a further opportunity to understand the Green Belt context and setting of the village. Its sense of openness was obvious.
- 5.16 I left the neighbourhood area by driving along the A1237 to the north so that I could understand more of its wider landscape setting and its relationship to the wider City.

## 6 The Neighbourhood Plan as a whole

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has been helpful in the preparation of this section of the report. It is an informative document and addresses the relevant details in a very professional way.
- 6.2 The Plan needs to meet all the basic conditions to proceed to referendum. This section provides an overview of the extent to which the Plan meets three of the five basic conditions. Paragraphs 2.6 to 2.10 of this report have already addressed the issue of conformity with European Union legislation.

### *National Planning Policies and Guidance*

- 6.3 The key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in March 2012. Paragraph 3.4 of this report has addressed the transitional arrangements which the government has put in place as part of the publication of the 2018 version of the NPPF.
- 6.4 The NPPF sets out a range of core land-use planning principles to underpin both plan-making and decision-taking. The following are of particular relevance to the Earswick Neighbourhood Plan:
- Being genuinely plan-led to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. In this case there is a particular significance to the relationship between the submitted Plan and the emerging Local Plan;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - Promoting the vitality of main urban areas;
  - Protecting the Green Belt around the main urban areas (in this case York);
  - proactively driving and supporting economic development to deliver homes, businesses and industrial units and infrastructure;
  - Conserving heritage assets in a manner appropriate to their significance; and
  - Seeking to secure high quality design and good standards of amenity for all existing and future occupants of land and buildings

- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a golden thread running through the planning system. Paragraph 16 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and relevant ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has regard to national planning policies and guidance in general terms. It sets out clear ambitions for its future based on maintaining the attractiveness and settings of the village in its agricultural context and its proximity to the York urban area. Within the context available it safeguards the general extent of the Green Belt. It proposes detailed policies to protect local green spaces within the village itself.
- 6.8 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraphs 17 and 154). This was reinforced with the publication of Planning Practice Guidance in March 2014. Its paragraph 41 (41-041-20140306) indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Several of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies to promote new infill residential development (ENP1). In the social role, it includes a policy on community facilities (ENP10) and on Housing Mix (ENP2). In the environmental dimension the Plan positively seeks to protect the natural, built and historic environment of the parish. In particular, it proposes a policy to protect the general extent of the Green Belt (ENP4). It also includes a policy for local green spaces (ENP5) and ecology/biodiversity (ENP6).

*General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in the wider City of York area in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the development plan. I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan subject to the modifications recommended in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the range of policies in the Plan. In particular, it makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is thorough and distinctive to the Plan area. The wider community and the Parish Council have spent considerable time and energy in identifying the issues and objectives that they wish to be included in their Plan. This gets to the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20170728) which indicates that neighbourhood plans must address the development and use of land. In some cases, I have concluded that elements of certain policies are not land use based. I have recommended that they are identified as such in the Plan. They would not form part of the development plan in the event that the neighbourhood plan is 'made'.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. In some cases, there are overlaps between the different policies.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial sections of the Plan (sections 1-3)*

- 7.8 These introductory elements of the Plan set the scene for its range of policies. They do so in a concise and proportionate way. The Plan is well- presented and arranged and it is supported by maps and diagrams. It makes a careful use of photographs to reinforce its key elements. There is a clear distinction between the policies and the supporting text.
- 7.9 The Introduction (Section 1) set out some detail on the production of the Plan and its planning policy context. It describes how a made neighbourhood plan would sit within the wider planning system. It also comments about the pre-submission versions of the Plan and the associated consultation exercises. It then comments in considerable detail about the wider planning policy context in York, and the relationship that the

Plan has sought to achieve with the emerging Local Plan. Its final elements on consultation overlap with the contents of the Consultation Statement

- 7.10 Section 2 provides helpful information on the parish/neighbourhood area. It describes the relatively recent significant increase in its population. It also clarifies that, somewhat uniquely, the parish has never had a church, a school or a public house. Its final sections comment about the very high rates of economic activity and home ownership levels in the neighbourhood area
- 7.11 Section 3 helpfully describes the Plan's Vision – 'Earswick Parish will be a desirable place to live for all residents based on its distinctive, semi-rural character and open space, safe and secure environment and community spirit'. It then identifies five objectives for the neighbourhood plan.
- 7.12 Thereafter Section 4 provides detailed commentary on a series of policies that arise from the Vision and Aims of the Plan. On this basis the remainder of this section of the report addresses each policy in turn in the context set in paragraphs 7.5 to 7.7 in this report.

#### Policy ENP 1: Windfall Housing Development

- 7.13 This policy establishes a basis against which proposals for windfall development can be assessed. It does so in two ways. In the first instance it identifies that windfall development is either small scale infill development or for the reuse of brownfield land or buildings. In the second instance it sets out a series of environmental criteria against which proposals would be assessed.
- 7.14 The approach adopted by the policy in general terms meets the basic conditions. Nevertheless, within this supporting context I recommend a series of modifications as follows:
- the deletion of the first sentence. It is supporting text that is already adequately addressed in paragraphs 99-111 of the Plan;
  - to ensure that any proposal needs to comply with all the criteria in the policy (as appropriate to its detail/location); and
  - to clarify the Green Belt component of the policy

#### **Delete the first sentence.**

**At the end of criteria a) to f) replace the full stop with a semi-colon. At the end of criterion g) replace the full stop with ' ; and'.**

**In criterion h) replace 'Green Belt' with 'national Green Belt policy'.**

#### Policy ENP2: Housing Mix

- 7.15 This policy sets out to ensure that new housing development meets the identified need for smaller homes. It does so in a non-prescriptive way. It also is designed to be future proofed throughout the Plan period by the use of 'an up to date assessment of housing need'.
- 7.16 I am satisfied that the policy meets the basic conditions. It is underpinned by local evidence collected as part of the plan-making process. In supporting the policy CYC



comment that the associated text should make explicit reference to work that it has carried out which overlaps with and confirms the local work. I am happy to address this matter by way of a recommended modification.

*At the end of paragraph 114 add: 'This information is also underpinned by evidence in the Strategic Housing Market Assessment produced by the City of York Council'.*

*At the end of paragraph 116 add: 'This requirement is captured in Policy ENP 2. Its reference to 'an up to date assessment of housing need' relates both to parish-based evidence and to wider evidence in the City of York Strategic Housing Market Assessment'*

Policy ENP3: Flood Risk and Climate Change

- 7.17 This policy addresses flood risk issues in the neighbourhood area. I saw the significance of the River Foss in the local environment as part of my visit.
- 7.18 The policy has two related parts. The first seeks to provide a local dimension to the sequential approach set out in national policy. Map 2 indicates the extent of land within the neighbourhood area within Flood Zone 3. The second part sets out a range of measures which the Plan would encourage in order to reduce emissions/air quality and to reduce flood risk.
- 7.19 I am satisfied that with appropriate modifications that the first part of the policy adds value to national policy and therefore meets the basic conditions. Some of the recommended modifications update the referenced documents. The second part of the policy takes on a more promotional role in 'encouraging' certain types of development and/or mitigation. I recommend that this part of the policy is recast so that it offers support to the specified types of development. The 'encouragement' of certain types of development has little if any weight in the context of a planning policy which has been designed to form part of the development plan.

**In the first part of the policy:**

- **insert '(as shown as Flood Zone 3 on Map 2) between 'areas' and 'should'**
- **replace 'City Council' with 'the City of York Council's Strategic Flood Risk Assessment'**
- **delete 'and Environmental.... assessments.'**
- **replace 'consider' with 'address'.**
- **replace 'PPG25' with 'paragraph 103 of the NPPF (2012)'.**

**In the second part of the policy:**

- **delete the first sentence;**
- **replace the remaining part of the opening section of this part of the policy with 'Developers should address the relationship between climate change and potential flood risk in any proposals which have the ability to impact on the flood capacity of Flood Zone 3 in the neighbourhood area. The following types of development and/or mitigation will be supported:**

*At the end of the supporting text in paragraph 117 add:*

*'The second part of the policy recognises that climate change has the ability to increase flood risk. It sets out a range of initiatives that the Plan supports to reduce the potential impacts of climate change.'*

#### Policy ENP 4: Green Belt

- 7.20 This policy sits at the very heart of the Plan. It reflects the significance of the Green Belt in the neighbourhood area. It also reflects the importance of the Green Belt to the preparation of the Plan and to the wider community.
- 7.21 The policy has been designed in challenging circumstances. CYC is in the process of preparing a Local Plan whilst at the same time the submitted Plan needs to be in general conformity with the strategic policies of the development plan. These are two saved policies from the Regional Spatial Strategy for Yorkshire and Humber as follows:
- Policy YH9: Green Belts – the definition of the inner boundaries of the Green Belt around York
- Policy Y1: York sub area – the definition of detailed boundaries of the outstanding sections of the green belt and the inner boundary and the protection and enhancement of the historic and environment character of York
- 7.22 The two saved policies from the RSS are instructive policies and set out how the Green Belt boundaries are to be defined in the development plan. This process is now well underway. The environmental assessment process for the RSS abolition highlighted that York did not have a local plan in place at that time. It also indicated that revocation of York Green belt policies before an adopted local plan was in place could lead to a significant negative effect upon the special character and setting of York. As such the government concluded that the York Green Belt policies that were part of the RSS should be retained.
- 7.23 As identified in Section 5 of this report whilst significant progress has now been made the CYC does not yet have an adopted Local Plan. The City of York Draft Local Plan incorporating the Fourth Set of Changes Development Control Local Plan (April 2005) was approved for development control purposes. Amongst other things this draft local plan provides a spatial context for the Green Belt. What is now the draft Local Plan was placed on deposit in May 1998. A very tight Green Belt was put forward on the basis that there would be a need for an early review in the light of new information at that time on development requirements after 2006. The Council subsequently published two sets of proposed changes, one in March 1998 and one in August 1999. Neither set of changes had any significance for the general extent of the Green Belt. The Council published its third set of changes in February 2003 after receiving the Planning Inspector's provisional findings. It then approved a fourth set of changes for development control purposes.

- 7.24 Whilst the Council decided not to proceed with the fourth set of changes it continues to use them for development management decisions. The effect of this process is that decisions on planning applications falling within the general extent of the Green Belt (as defined in the RSS) are taken on the basis that land is treated as Green Belt.
- 7.25 Within this context, the importance of retaining York's Green Belt is evident both in day-to-day development management decisions and in associated appeal decisions. Plainly these circumstances will be clarified once the emerging Local Plan is adopted. However, that Plan it is not at a sufficiently-advanced stage to provide any clarity or certainty for the examination of this neighbourhood plan. In particular the package of proposals for defining Green Belt boundaries and the strategic release of land for housing purposes has yet to be tested.
- 7.26 The submitted Plan has carefully translated this complicated backcloth into the Policy and the associated Map 3. Its effect is to safeguard the Green Belt as described in paragraph 7.22 to 7.24 above. This approach is entirely consistent with the development plan context. I recommend that the source of the detail in Map 3 is acknowledged for the avoidance of any doubt about its origin.
- 7.27 As part of the examination process CYC has provided me with a schedule of representations made to the emerging Local Plan on the definition of the Green Belt within the neighbourhood area. There is a degree of overlap between the representations to the Local Plan and those made to the submitted neighbourhood plan (see paragraph 4.8). Plainly the Local Plan representations have not yet been tested as part of the examination of that Plan.
- 7.28 I am satisfied that the submitted Plan has taken an appropriate approach that meets the basic conditions to this important matter. The definition of the Green Belt reflects that set out in the CYC's Fourth Set of Changes Development Control Local Plan (April 2005).
- 7.29 Policy ENP4 has five related sections. The first four identify the general extent of the Green Belt in the neighbourhood area and apply national policy to that area. The fifth paragraph comments that national policy identifies that certain types of development can take place within the Green Belt. It then goes on to comment that any such development which might take place in the neighbourhood area should still endeavour to preserve the openness of the general extent of the Green Belt.
- 7.30 I can understand the reasoning behind the inclusion of this part of the policy. Nevertheless, it is partly supporting text on the one hand and its use of 'should still endeavour' (to preserve the openness of the Green Belt) on the other hand has a slightly different approach from that set out in paragraph 90 of the NPPF. In these circumstances I recommend that the fifth part of the policy is relocated into the supporting text. Plainly this recommended modification does not affect either the integrity of paragraph 90 of the NPPF or its applicability to the neighbourhood area.
- 7.31 In its representations to the Plan CYC suggest that paragraphs 135-138 of the Plan are replaced with revised text which updates the position on the emerging Local Plan and provides a refined technical context to this important part of the Plan. I recommend modifications on this basis.

- 7.32 Paragraph 141 of the Plan correctly acknowledges that the Green Belt boundary will be determined in the emerging Local Plan. Nevertheless, it then goes on to suggest that there is a compelling case for the confirmation of the existing boundaries (and as shown on the Proposals Map). This may prove to be the case. However, it is not a matter for the examination of this neighbourhood plan. It will be determined by the Local Plan inquiry in due course. On this basis I recommend a modification to the text which takes on a more neutral tone.

**Delete the fifth paragraph of the policy.**

*Insert the deleted element of the policy as a further element of supporting text at the end of paragraph 139.*

*In Map 3 sub title (Existing Draft Green Belt) add 'as defined in the City of York fourth set of changes Development Control Local Plan (April 2005)'.*

*Replace paragraphs 135-138 with the following:*

*'135. The neighbourhood plan has been produced within the context of the preparation of the emerging City of York Local Plan (2017-2033). The Local Plan will establish detailed Green Belt boundaries.*

*136. This approach follows the advice in paragraphs 83-85 of the NPPF that the identification and modification of Green Belt boundaries are matters for the local planning authority to determine. At the same time the neighbourhood plan needs to be in general conformity with the strategic policies of the development plan. In this case these are policies YH9 and Y1 of the Yorkshire and Humber Regional Spatial Strategy. These policies identify the general extent of the York Green Belt and set out its national significance.*

*137. Whilst not forming part of the development plan the City of York Draft Local Plan incorporating the fourth set of changes Development Control Local Plan (April 2005) was approved for development control purposes.*

*138. The effect of this process is that decisions on planning applications falling within the general extent of the Green Belt (as defined in the RSS) are taken on the basis that land is treated as Green Belt.'*

*In paragraph 141:*

- *replace 'which underpins its identification' with 'carried out as part of the preparation of this neighbourhood plan'.*
- *replace the second sentence with 'The retention of the Green Belt in the neighbourhood area is a top priority for local people'.*

**Policy ENP5: Local Green Spaces**

- 7.33 This policy reflects the very important role of open and green spaces within Earswick. In doing so it proposes the designation of Local Green Spaces (LGSs) as set out in paragraphs 76-78 of the NPPF. The analysis of the proposed LGSs against the criteria set out in the NPPF is included within Appendix A of the Basic Conditions Statement. It is a very compelling exercise. The Parish Council provided additional

reassurance over and above that within the Appendix (on the size of LGSs 2 and 7) as part of the Clarification Note process.

- 7.34 I am satisfied that the seven proposed LGSs relate comfortably to the three criteria in the NPPF. As such the policy meets the basic conditions.

Policy ENP6: Ecology and Biodiversity

- 7.35 This policy requires that development proposals should conserve, enhance and incorporate adjacent biodiversity. It identifies three locations within the neighbourhood area which are considered to be particularly important. The sites are identical to three of the sites proposed for designation as LGS in Policy ENP5. The supporting text highlights the potential designation of the three sites as 'Sites of Local Interest' in the emerging Local Plan. CYC has advised in its representation that it is not pursuing this approach in the Local Plan.
- 7.36 I sought advice from the Parish Council both on the approach taken and the overlap with the package of LGSs. I was advised that the overlap seeks to ensure a backstop in the event that Sites of Local Interest are not pursued in the emerging Local Plan. Whilst I recognise the difficulty of preparing a neighbourhood plan in the circumstances where a local plan is also being prepared it is important that the neighbourhood plan (if 'made') has the clarity required by the NPPF.
- 7.37 Through the Clarification Note process the Parish Council agreed with a potential remedy which would modify the policy so that it took on a more general form. Within that context the three areas concerned could be identified as particularly important ecological areas in a general sense. I recommend accordingly. I also recommended associated modifications to paragraph 153.

**Replace the second sentence of the policy with: 'In particular development proposals that would affect the three sites listed below and shown on Map 5 should conserve and enhance their ecological networks and features (including their waterways, hedgerows and trees)'.**

*Replace paragraph 153 (second sentence) with 'Discussions have taken place with the City of York Council about the extent to which they are capable of specific ecological designation as part of the emerging Local Plan. Plainly this issue will be resolved as part of that process. On this basis the approach adopted in Policy ENP6 is one of a general nature towards ecology and biodiversity and within which the three sites concerned are identified as having a particular significance'.*

Policy ENP7: Distinctive Views

- 7.38 This policy sets out to respect three views over agricultural land to the immediate east of Strensall Road. They are shown on Map 5.
- 7.39 I looked at the various views when I visited the neighbourhood area. I saw that they afforded an open aspect from the village into and across the Green Belt to the east. CYC comment in in a similar fashion in its representation. It suggests a modification that would ensure a focus on the open and rural nature of the landscape (and the associated views) rather than their distinctiveness. I agree with the suggested approach and recommend accordingly. Whilst the thrust of the policy remains

unchanged the sharper focus of the modified policy would be more practicable to deliver through the development management process.

**Replace ‘distinctive views’ with ‘open character and rural setting as experienced in views eastwards from Strensall Road’**

Policy ENP8: Trees and Hedgerows

- 7.40 This policy supports proposals that would enhance the coverage of trees and hedgerows. It also sets out to safeguard existing trees and hedgerows and that they are integrated into the design of development proposals where it is possible to do so.
- 7.41 I recommend a modification to the wording of the first sentence of the policy. This will ensure that it properly relates to the development management process. Otherwise it comfortably meets the basic conditions. Its implementation will do much to contribute to the delivery of the environmental dimension of sustainable development in the neighbourhood area.

**Replace ‘Opportunities to’ with ‘Proposals that would’.**

Policy ENP9: Buildings and Structures of Local Heritage Interest

- 7.42 This policy aims to protect important buildings and structures of local heritage interest. In the event it identifies a single type of structure (the Parish Signs). I looked at their significance when I visited the neighbourhood area. I understood why they had been selected for inclusion within the Plan.
- 7.43 I am satisfied that the Village Signs should be safeguarded as a structure of local interest. I recommend that the policy is modified so that it takes account of the single identified structure. I also recommended a modification to the detailed wording of the policy.

**In the first part of the policy replace ‘the buildings and structures listed below’ with ‘the Earswick Parish Signs’**

**In the third part of the policy delete ‘including important views towards and from them. Development.... detail.’**

**At the end of the policy delete the bullet point.**

Policy ENP10: Protecting Important Community Facilities

- 7.44 This policy aims to protect important community facilities. In the event it identifies a single facility (the Village Hall). I looked at the village hall when I visited the neighbourhood area. I saw that it was a well-maintained modern building in a very central and convenient location.
- 7.45 I am satisfied that the village hall should be safeguarded as a community facility. I recommend that the policy is modified so that it takes account of the single identified community facility. I also recommended a modification to the detailed wording of the policy.

**Replace: ‘an existing community facility’ with ‘the Earswick Village Hall’ and ‘allowed’ with ‘supported’.**



**Delete the final sentence of the policy.**

*In paragraph 173 replace 'These buildings' with 'The Village Hall'.*

Policy ENP11: Enhancements to Transport and Highways

- 7.46 The policy addresses a series of transport and highway-related matters. Its overarching context is that the Parish Council will actively seek to work with CYC and other bodies to encourage opportunities for enhancements to the transport and highway network in the neighbourhood area.
- 7.47 Some of the enhancements listed in the policy are land-use based. Others are not. In this context I recommend that, with contextual modifications, the former category is retained within the policy. I also recommend that the latter category is deleted from the policy and repositioned into a separate, non-land use section of the Plan. This matter was agreed with the Parish Council through the clarification note process.

**Replace the policy with the following:****(Title) Traffic Capacity and sustainable transport**

**'Development proposals will be supported where they provide appropriate capacity and/or mitigation for the additional traffic which they generate. Development proposal should also identify how they will incorporate measures to ensure the safe movement of pedestrians and cyclists to the various services and community facilities in the neighbourhood area.**

**Proposals for the provision of a dedicated cycle route to Huntington will be supported'.**

*Reposition the submitted policy (introductory section) and items a), b) and c) to a separate, non-land use part of the Plan and with a revised Policy number to read 'Community Action 1'*

*At the end of paragraph 182 add:*

*'Policy ENP11 addresses a series of traffic capacity and sustainable transport issues. These will have a direct bearing on the determination of planning applications. Community Action 1 later in the Plan sets out how the Parish Council will work with the City of York Council and other bodies to improve the transport and highway network in the neighbourhood area in a more general sense'.*

Policy ENP12: Protecting Footpaths/Bridleways and Cycleways

- 7.48 This policy sets out to protect footpaths/bridleways and footpaths. In addition, it also requires that new development should contribute to the improvement of the existing networks where it is appropriate for them to do so.
- 7.49 The policy takes a proportionate approach to this important matter. It meets the basic conditions.

Policy ENP 13: Safe and Secure Parish

- 7.50 This policy addresses safety and security in the neighbourhood area. These issues are addressed in national policy in a general sense.
- 7.51 However as submitted this policy reads more as a statement of intent rather than as a planning policy. The Parish Council acknowledged this issue in its response to my clarification note. In these circumstances I recommend a modification to its structure so that it would support proposals that ‘create attractive and safe public and private places’. This would bring the clarity required by the NPPF in general terms. It would also provide guidance for the operation of the development management system by CYC throughout the Plan period.

**Replace the policy with:**

**‘Proposals that create attractive and safe public and private places as part of their design, layout and configuration will be supported’.**

Policy ENP 14: Developer Contributions

- 7.52 This policy identifies the Parish Council’s priorities for its use of community infrastructure levy funding and/or section 106 agreements. The supporting text highlights how the City of York Council Community Infrastructure Levy (CIL) is being developed and its ability to be operative throughout significant parts of the Plan period.
- 7.53 I am satisfied that the policy is land use based. It identifies a series of land use matters that would be priority projects within the neighbourhood area in the event that CIL or Section 106 monies are forthcoming from new development. I recommend a modification that will ensure that the policy is more directive. As submitted, it reads in a rather loose fashion by ‘seeking’ to prioritise funding.

**Delete ‘seek to’ from the policy wording.**

Other Matters

- 7.54 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for CYC and the Parish Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies.*



## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2037. It is thorough and distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following my independent examination of the Plan I have concluded that the Earswick Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.
- 8.3 This report has recommended a range of modifications to the policies in the Plan. Nevertheless, its structure and format remain largely unaffected.

### *Conclusion*

- 8.4 On the basis of the findings in this report I recommend to the City of York Council that subject to the incorporation of the modifications set out in this report that the Earswick Parish Neighbourhood Development Plan should proceed to referendum.

### *Referendum Area*

- 8.5 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view the neighbourhood area is entirely appropriate for the purpose of the referendum. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the City Council on 9 December 2015.
- 8.6 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner. The Parish Council's response to the Clarification Note was particular helpful.

**Andrew Ashcroft**  
**Independent Examiner**  
**7 January 2019**

**City of York Council****EARSWICK NEIGHBOURHOOD PLAN:  
POST- EXAMINATION DECISION STATEMENT****Regulation 18 of the Neighbourhood Planning  
(General) Regulations 2012 (as amended)**

This document is the decision statement required to be prepared under Regulation 18(2) of the Neighbourhood Planning Regulations 2012 (as amended). It sets out the Council's response to each of the recommendations contained within the Report to City of York Council of the independent examination of the Earswick Neighbourhood Plan ("the Plan") by independent Examiner Mr Andrew Ashcroft, which was submitted to the Council on 7<sup>th</sup> January 2019.

This decision statement, the independent Examiner's Report and the submission version of Earswick Neighbourhood Plan and supporting documents can be viewed on the Council's website: [www.york.gov.uk/neighbourhoodplanning](http://www.york.gov.uk/neighbourhoodplanning)

Paper copies of this decision statement and the independent Examiner's Report can be viewed during normal opening times at the following locations:

- City of York Council's West Offices,
- York Explore Library,
- Strensall Library and
- Huntington Library

**1.0 BACKGROUND**

- 1.1 Under the Town and Country Planning Act 1990 (as amended), City of York Council ("the Council") has a statutory duty to assist communities in the preparation of neighbourhood (development) plans and to take plans through a process of examination and referendum. The Localism Act 2011 (Part 6, Chapter 3) sets out the Local Planning Authority's responsibilities under neighbourhood planning.
- 1.2 This statement confirms that the modifications proposed by the Examiner's Report have been considered and accepted and that subject to making the recommended modifications (and other minor modifications) the Plan may now be submitted to referendum.
- 1.3 The Earswick Neighbourhood Plan relates to the area that was designated by the Council as a Neighbourhood Area on 9<sup>th</sup> December 2015. This area is coterminous with the boundary of the parish of Earswick and is entirely within the Local Planning Authority's area.

- 1.4 Earswick Parish Council undertook two pre-submission consultations on the draft Plan in accordance with Regulation 14. Consultation on 1<sup>st</sup> Pre-Submission Version took place between 20<sup>th</sup> November 2016 and 7<sup>th</sup> January 2017. Consultation on 2<sup>nd</sup> Pre-Submission Version took place between 4<sup>th</sup> December 2017 and 5<sup>th</sup> February 2018.
- 1.5 Following the submission of the Earswick Neighbourhood Plan to the Council in February 2018, the Council publicised the draft Plan for a six-week period and representations were invited in accordance with Regulation 16. The publicity period ended at on 15<sup>th</sup> November 2018.

## **2.0 INDEPENDENT EXAMINATION**

- 2.1 The Council appointed Mr Andrew Ashcroft BA (Hons) MA, DMS, MRTPI, with the consent of Earswick Council, to undertake the independent examination of the Earswick Neighbourhood Plan and to prepare a report of the independent examination.
- 2.2 The Examiner examined the Plan by way of written representations supported by an unaccompanied site visit of the Neighbourhood Plan Area on 29<sup>th</sup> November 2018.
- 2.3 The Examiner's Report was formally submitted on 7<sup>th</sup> January 2019. The Report concludes that subject to making the modifications recommended by the Examiner, the Plan meets the basic conditions set out in the legislation and should proceed to referendum. The Examiner also recommends that the referendum area should be the same as the designated Neighbourhood Area, which is the same as the administrative boundary for Earswick parish.
- 2.4 Following receipt of the Examiner's Report, legislation requires that the Council consider each of the modifications recommended, the reasons for them, and decide what action to take. The Council is also required to consider whether to extend the area to which the referendum is to take place.

## **3.0 DECISION AND REASONS**

- 3.1 Having considered each of the recommendations made in the Examiner's Report and the reasons for them, the Council, has decided to accept all of the Examiner's recommended modifications to the draft Plan. These are set out in Table 1 below.
- 3.2 The Council considers that, subject to the modifications being made to the Plan as set out in Table 1 below, the Earswick Neighbourhood Plan meets the basic conditions mentioned in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) is compatible with the Convention rights and meets

the requirements of paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

- 3.3 As a consequence of the required modifications, the Council will modify the Earswick Neighbourhood Plan accordingly, for it then to proceed to referendum.
- 3.4 The Examiner recommended that the Neighbourhood Plan should proceed to a referendum based on the designated Neighbourhood Area. The Council has considered this recommendation and the reasons for it, and has decided to accept it. The referendum area for the final Earswick Neighbourhood Plan will therefore be based on the designated Earswick Parish Neighbourhood Area.
- 3.5 This decision will be made at a meeting of the Council's Executive on 7<sup>th</sup> March 2019.
- 3.6 This decision statement will be dated 7<sup>th</sup> March 2019.

**Other information:**

The Neighbourhood Plan document will be updated to incorporate all the modifications required and re-titled Referendum Version. The date for the referendum and further details will be publicised shortly once a date is set by the Council.

**Table 1: Examiner’s Recommended Modifications**

<b>Earswick NP Policy</b>	<b>Examiner’s Report Reference</b>	<b>Recommended Modification</b>	<b>CYC Consideration/ Justification</b>
ENP 1: Windfall Housing Development	Para. 7.13 - 7.14	<p><b>Delete the first sentence.</b></p> <p><b>At the end of criteria a) to f) replace the full stop with a semi-colon. At the end of criterion g) replace the full stop with ‘; and’.</b></p> <p><b>In criterion h) replace ‘Green Belt’ with ‘national Green Belt policy’.</b></p>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP2: Housing Mix	Para. 7.15 - 7.16	<p><i>At the end of paragraph 114 add: ‘This information is also underpinned by evidence in the Strategic Housing Market Assessment produced by the City of York Council’.</i></p> <p><i>At the end of paragraph 116 add: ‘This requirement is captured in Policy ENP 2. Its reference to ‘an up to date assessment of housing need’ relates both to parish-based evidence and to wider evidence in the City of York Strategic Housing Market Assessment’</i></p>	Agree with the modifications for the reasons set out in the Examiners Report.

ENP3: Flood Risk and Climate Change	Para. 7.17 – 7.19	<p><b>In the first part of the policy:</b></p> <ul style="list-style-type: none"> <li>• insert '(as shown as Flood Zone 3 on Map 2) between 'areas' and 'should'</li> <li>• replace 'City Council' with 'the City of York Council's Strategic Flood Risk Assessment'</li> <li>• delete 'and Environmental.... assessments.'</li> <li>• replace 'consider' with 'address'.</li> <li>• replace 'PPG25' with 'paragraph 103 of the NPPF (2012)'.</li> </ul> <p><b>In the second part of the policy:</b></p> <ul style="list-style-type: none"> <li>• delete the first sentence;</li> <li>• replace the remaining part of the opening section of this part of the policy with 'Developers should address the relationship between climate change and potential flood risk in any proposals which have the ability to impact on the flood capacity of Flood Zone 3 in the neighbourhood area. The following types of development and/or mitigation will be supported:</li> </ul> <p><i>At the end of the supporting text in paragraph 117 add:</i></p> <p><i>'The second part of the policy recognises that climate change has the ability to increase flood risk. It sets out a range of initiatives that the Plan supports to reduce the potential impacts of climate change.'</i></p>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP 4: Green Belt	Para. 7.20 – 7.32	<p><b>Delete the fifth paragraph of the policy.</b></p> <p><i>Insert the deleted element of the policy as a further element of supporting text at the end of paragraph 139.</i></p> <p><i>In Map 3 sub title (Existing Draft Green Belt) add 'as defined in the City of York fourth set of changes Development Control purpose Local Plan (April 2005)'.</i></p> <p><i>Replace paragraphs 135-138 with the following:</i></p>	Agree with the modifications for the reasons set out in the Examiners Report.

		<p><i>'135. The neighbourhood plan has been produced within the context of the preparation of the emerging City of York Local Plan (2017-2033). The Local Plan will establish detailed Green Belt boundaries.</i></p> <p><i>136. This approach follows the advice in paragraphs 83-85 of the NPPF that the identification and modification of Green Belt boundaries are matters for the local planning authority to determine. At the same time the neighbourhood plan needs to be in general conformity with the strategic policies of the development plan. In this case these are policies YH9 and Y1 of the Yorkshire and Humber Regional Spatial Strategy. These policies identify the general extent of the York Green Belt and set out its national significance.</i></p> <p><i>137. Whilst not forming part of the development plan the City of York Draft Local Plan incorporating the fourth set of changes Development Control Local Plan (April 2005) was approved for development control purposes.</i></p> <p><i>138. The effect of this process is that decisions on planning applications falling within the general extent of the Green Belt (as defined in the RSS) are taken on the basis that land is treated as Green Belt.'</i></p> <p><i>In paragraph 141:</i></p> <ul style="list-style-type: none"> <li>• <i>replace 'which underpins its identification' with 'carried out as part of the preparation of this neighbourhood plan'.</i></li> <li>• <i>replace the second sentence with 'The retention of the Green Belt in the neighbourhood area is a top priority for local people'.</i></li> </ul>	
ENP5: Local Green Spaces	Para. 7.33 – 7.34	No modifications proposed.	N/A
ENP6: Ecology and Biodiversity	Para. 7.35 – 7.37	<b>Replace the second sentence of the policy with: 'In particular development proposals that would affect the three sites listed below and shown on Map 5 should conserve and enhance their ecological networks and features (including their waterways, hedgerows and trees)'.</b>	Agree with the modifications for the reasons set out in the Examiners Report.



		<i>Replace paragraph 153 (second sentence) with ‘Discussions have taken place with the City of York Council about the extent to which they are capable of specific ecological designation as part of the emerging Local Plan. Plainly this issue will be resolved as part of that process. On this basis the approach adopted in Policy ENP6 is one of a general nature towards ecology and biodiversity and within which the three sites concerned are identified as having a particular significance’.</i>	
ENP7: Distinctive Views	Para. 7.38 – 7.39	<b>Replace ‘distinctive views’ with ‘open character and rural setting as experienced in views eastwards from Strensall Road’</b>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP8: Trees and Hedgerows	Para. 7.40 – 7.41	<b>Replace ‘Opportunities to’ with ‘Proposals that would’.</b>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP9: Buildings and Structures of Local Heritage Interest	Para. 7.42 – 7.43	<b>In the first part of the policy replace ‘the buildings and structures listed below’ with ‘the Earswick Parish Signs’</b>  <b>In the third part of the policy delete ‘including important views towards and from them. Development.... detail.’</b>  <b>At the end of the policy delete the bullet point.</b>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP10: Protecting Important Community Facilities	Para. 7.44 – 7.45	<b>Replace: ‘an existing community facility’ with ‘the Earswick Village Hall’ and ‘allowed’ with ‘supported’.</b>  <b>Delete the final sentence of the policy.</b>  <i>In paragraph 173 replace ‘These buildings’ with ‘The Village Hall’.</i>	Agree with the modifications for the reasons set out in the Examiners Report.
ENP11:	Para. 7.46	<b>Replace the policy with the following:</b>	Agree with the

Enhancements to Transport and Highways	– 7.47	<p><b>(Title) Traffic Capacity and sustainable transport</b></p> <p><b>‘Development proposals will be supported where they provide appropriate capacity and/or mitigation for the additional traffic which they generate. Development proposal should also identify how they will incorporate measures to ensure the safe movement of pedestrians and cyclists to the various services and community facilities in the neighbourhood area.</b></p> <p><b>Proposals for the provision of a dedicated cycle route to Huntington will be supported’.</b></p> <p><i>Reposition the submitted policy (introductory section) and items a), b) and c) to a separate, non-land use part of the Plan and with a revised Policy number to read ‘Community Action 1’</i></p> <p><i>At the end of paragraph 182 add:</i></p> <p><i>‘Policy ENP11 addresses a series of traffic capacity and sustainable transport issues. These will have a direct bearing on the determination of planning applications. Community Action 1 later in the Plan sets out how the Parish Council will work with the City of York Council and other bodies to improve the transport and highway network in the neighbourhood area in a more general sense’.</i></p>	modifications for the reasons set out in the Examiners Report.
ENP12: Protecting Footpaths/Bridle ways and Cycleways	Para. 7.48 – 7.49	No modifications proposed.	N/A
ENP 13: Safe and Secure Parish	Para. 7.50 – 7.51	<p><b>Replace the policy with:</b></p> <p><b>‘Proposals that create attractive and safe public and private places as part of their design, layout and configuration will be supported’.</b></p>	Agree with the modifications for the reasons set out in the Examiners Report.

ENP 14: Developer Contributions	Para. 7.52 – 7.53	<b>Delete ‘seek to’ from the policy wording.</b>	Agree with the modifications for the reasons set out in the Examiners Report.
Other Matters		<i>Modification of general text (where necessary) to achieve consistency with the modified policies.</i>	Agree with the modifications for the reasons set out in the Examiners Report.

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# Earswick Parish

# Annex C

## Neighbourhood Plan

### Submission Version (2)

2017-2037



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## Acknowledgements

The Parish Council would like to thank all the residents of Earswick, and in particular the following individuals and organisations, for their hard work and support in the preparation of this Neighbourhood Plan:

Bill Gambold

Derek Jones

Sian Wiseman

Francis Martin

Graham Tate

Ian Yeowart

Jim McTurk

Andrew Towleron - *YourLocale*

Locality/Groundwork

City of York Council

Earswick Parish Council

Fosslands Farm Management Company limited

## Foreword

We are proud to present the Earswick Neighbourhood Plan 2017 – 2037.

The Plan has been 2 years in the making and builds on previous work undertaken as part of the Earswick Parish Plan 2012.

We are fortunate to live in a beautiful semi-rural environment, surrounded by over 30 acres of public open space. The local environment affords residents a high quality of life in peaceful surrounds and its close proximity to York provides access to a thriving city.

This is the community's Plan and the vision, objectives and subsequent policy framework in this document have been developed from your ideas and aspirations for the future of Earswick. Community sentiment strongly opposes any development of the draft Green Belt within the boundaries of the Parish but is in favour of modest development on brownfield sites, so long as it is in keeping with the character, sensitive to the environment and reflective of the level of infrastructure provision within the Parish. The policies within this Plan aim to guide future development in accordance with these preferences.

Change is inevitable, but by taking the opportunity to develop a neighbourhood plan for our community, we can help shape these changes to create the sort of place we want to live in now and in 20-years' time.

We recommend this Plan to you and hope that you will support its realisation as a guide for future development in Earswick.

Earswick Parish Council



### Summary

1. The Earswick Neighbourhood Plan 2017-2037 has been prepared by a Neighbourhood Plan Working Party under powers granted by the Localism Act 2011. This Working Party comprises members of the Parish Council and community volunteers, with the help of City of York Council and *YourLocale* and under the direction of Earswick Parish Council (the Accountable Body for the Plan).
2. The Neighbourhood Plan area covers the entire parish, an area having a population of some 1,000 and around 350 dwellings, and was formally designated by City of York Council on 9 December 2015.
3. The Earswick Neighbourhood Plan reflects community-wide comments, observations and concerns about its future, bringing them together with census information, strategic and statistical evidence into a “living promise” that mirrors the community’s overwhelming desire to make Earswick an even better place to live in, both now and for future generations.
4. There is not a current up to date Development Plan in place for the area, but in accordance with good practice, the Earswick Neighbourhood Plan has been prepared with regard to the emerging City of York Local Plan 2017 – 2037. The emerging City of York Local Plan has experienced a number of delays and is currently timetabled for examination in mid 2018.
5. The principal aims of the Earswick Neighbourhood Plan are to ensure that the Parish continues to be a safe and secure place in which to live; protect open space and the landscape; seek improvements to public transport facilities, road and footpath conditions; maintain and improve local facilities and deliver modest housing development (on brownfield sites) that is sensitive to the environment, infrastructure constraints and improves the quality of life of all current and future residents.
6. In order to achieve these aims, the Plan includes a number of development related policies that seek to:
  - Protect the draft Green Belt
  - Ensure that development is carefully controlled and takes place on sustainable brownfield sites;
  - Protect the countryside and special landscape;
  - Protect open spaces that are important to the community and/or wildlife;
  - Ensure that development is of a type and scale appropriate to the character and infrastructure provision;

- Encourage development that meets local needs;
- Protect important community facilities; and
- Seek ways of addressing traffic issues.

7. The Neighbourhood Plan is now at the 'Submission Stage'. This means that the Parish Council is satisfied that it has a robust Plan and asks City of York Council to check and consult with relevant bodies that it has been developed in accordance with relevant legislation and regulations. This is in accordance with rules covering the preparation of a Neighbourhood Plan.

8. Once it has successfully passed this stage, it will then go to an Independent Examiner, who will check to see that it has been prepared in the prescribed manner.

9. If the Plan successfully passes this stage, with any modifications, it will be put forward to referendum, where everyone on the electoral register in Earswick Parish will be invited to vote on whether or not they support it. At least 50% of those voting must vote yes for it to become a 'Made' statutory planning document. When the Plan is adopted, it will form part of the statutory Development Plan for York. Whilst planning applications will still be determined by City of York Council, the production of a Neighbourhood Plan will mean that they must have regard to its provisions and the relevant locally formulated policies when reaching planning decisions that affect Earswick Parish. This means that the residents of the Parish will have a far greater control over where development takes place and what it looks like.

### **How the Plan is Organised**

10. The Plan is organised into 6 sections as follows:

Section 1 – Provides an introduction to the Neighbourhood Plan, including the planning context and the process undertaken to develop the Plan.

Section 2 - Outlines a brief history and key characteristics of the Parish including identified issues and opportunities for the Plan to address.

Section 3 - Sets out the community's Vision and Objectives for the Earswick Parish Neighbourhood Plan.

Section 4 - Identifies within five themes, the Plan Policies that address the Vision and Objectives.

Section 5 - Outlines the use of developers' contributions in enhancing community infrastructure.

Section 6 - Explains the Plan Delivery, Implementation and on-going

Monitoring process.

## **1.0 Introduction**

11. Earswick, like many rural areas in recent time, has experienced increasing pressure for development. In situations like this, especially where there is no Local Plan with defined policies and agreed levels of growth, new developments often come forward in an ad-hoc fashion, possibly not in the most sustainable locations or best meeting the needs of the local community.

12. A Neighbourhood Plan is a new community led form of planning document which is part of the Government's approach to enable communities to better shape their area, to inform how development takes place and helps to influence the type, quality and location of that development, ensuring that change brings with it local benefit. The Earswick community is taking the opportunity to prepare a Neighbourhood Plan and have a real say over local decision making, to achieve its long-standing goals through the planning system and address the challenges and opportunities facing the future vitality of the Parish.

13. The Neighbourhood Plan is based on extensive research and influenced by robust engagement with the local community. The Plan builds on work undertaken as part of the Earswick Parish Plan, produced in 2012 which included a detailed questionnaire of all those living in the Parish.

14. The Plan provides a vision for the future of the Parish of Earswick and sets out clear planning policies to help realise the vision. The Neighbourhood Plan aims to make Earswick an even better place to live, now and for future generations. It will cover a 20-year time period with a review every 5 years. It covers the period 2017 to 2037, the same as the emerging City of York Council Local Plan.

### **1.1 Earswick Neighbourhood Plan Area**

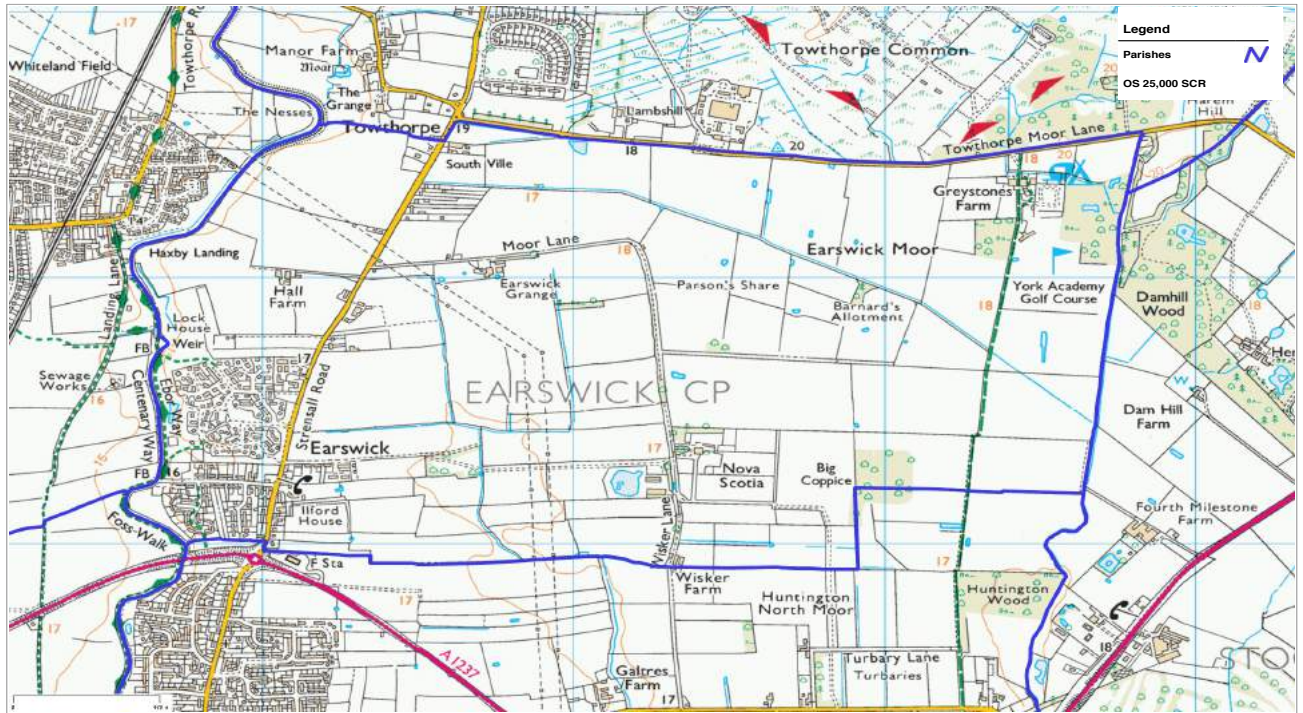
15. The Earswick Neighbourhood Plan Area, which accords with the Earswick Parish boundary, was designated by the City of York Council on 9 December 2015. The City Council's decision empowers Earswick Parish Council to produce a Neighbourhood Plan for the Parish of Earswick. The Earswick Neighbourhood Plan Area is shown in Map1.

Map 1 - Application Area



Parish Boundary

Earswick CP



Date Created: 15-3-2017 | Map Centre (Easting/Northing): 463254 / 457692 | Scale: 1:15087 | © Crown copyright and database right. All rights reserved (00009999) 2017 © Contains Ordnance Survey Data : Crown copyright and database right 2017

## 1.2 Planning Context

16. Neighbourhood Plans were introduced under the 2011 Localism Act, giving communities the power to produce their own neighbourhood plans that will influence future development in their local area. Essentially, neighbourhood plans can set out policies for the development and use of land in the whole or part of the designated area including the location and form of new development measures to protect the landscape and character and important community facilities.

17. Neighbourhood Plans can be narrow or broad in scope and there is no requirement to include policies dealing with a particular land use or development. The locally formulated policies will be specific to Earswick Parish and reflect the needs and aspirations of the community. In the case that there are national and district planning policies that meet the needs and requirements of the Parish, they are not repeated in the Plan

18. The Government's intention is for communities to have a greater say and role in the planning system by shaping future development in their area. However, all neighbourhood plans must be prepared to comply with a set of Basic Conditions. Firstly, neighbourhood plans must have regard to national policies that for England are set out in the National Planning Policy Framework (NPPF). The focus of this policy is the contribution that planning can make to sustainable development through the joint pursuance of economic, environmental and social improvement.

19. Secondly, the making of the neighbourhood plan must be in general conformity with the strategic policies contained in the development plan for the area. This requirement is somewhat complicated in the case of Earswick Parish in that there is currently no up to date development plan for the City of York. The City of York has been working on a Local Plan for a number of years, but progress has been stalled for a number of reasons. The current iteration of the Local Plan is timetabled for submission for examination in mid 2018. The City of York Draft Control Local Plan incorporating the 4<sup>th</sup> Set of Changes (April 2005) is currently a material consideration for development control decisions.

20. Despite the fact that the York green belt is still, technically, a draft Green Belt it has, de facto, been in existence for several decades and has been reaffirmed on numerous occasions in planning refusals and dismissals of planning appeals. It was specifically recognised in the Yorkshire and Humber Regional Spatial Strategy (RSS) adopted in 2007 and although the RSS was

substantially revoked by an Order (SI. No. 117 2013) made in early 2013 under the Localism Act 2011, policies which related to the York draft Green Belt were specifically excluded from the revocation.

21. These retained policies make it clear that development plans should define the detailed boundaries of the Green Belt around York. The outer boundary is to be about 6 miles from York city centre and the inner one is to be defined to establish the long-term development limits that safeguard the special character and setting of the historic city.

22. National Planning Practice Guidelines states that 'where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree on the relationship between policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan with appropriate regard to national policy and guidance.

23. The policies in the Earswick Neighbourhood Plan have been developed with due consideration to the emerging City of York Local Plan (2017) and is in general conformity with the existing local plan policies.

24. Finally, in order to meet the basic conditions, neighbourhood plans must be compatible with EU obligations and contribute to the achievement of sustainable development. Of particular relevance to neighbourhood planning is the assessment of certain plans on the environment (Strategic Environmental Assessment). A screening assessment has been undertaken and is available in a separate document. City of York Council, the Environment Agency, Natural England and Historic England have all confirmed that a full Strategic Environment Assessment is not required.

25. Once 'made' this Plan will form part of the statutory development plan for the Earswick Plan Area. Decisions on planning applications within the Plan Area will be made using both the Local Plan and the Neighbourhood Plan and any other material considerations.

### **1.3 Relationship between the Neighbourhood Plan and the draft Local Plan**

26. The Earswick Neighbourhood Plan is based on the evidence collated from a number of surveys and consultations with residents, businesses and representative groups, and is also informed by the response of residents to the draft City of York Preferred Options Local Plan published in June 2013.

27. The draft City of York Council Preferred Options Local Plan proposed that 81 hectares (210 acres) of draft Green Belt farmland to the east of the Parish be 'safeguarded' by removing it from the York draft Green Belt and allocating it for future housing development of up to 2,000 houses beyond 2030 with the proviso that if access and sustainability issues could be overcome part of this development of around 1,000 houses could be brought forward into the plan period. This overwhelming amount of development in Earswick seemed to have been based on the amount of land that willing landowners were prepared to make available, rather than on any objective, evidence-based assessment of the amount and spatial distribution of new housing development required.

28. The draft City of York Preferred Options Local Plan proposals were met with considerable resistance by the residents of the Parish. Following two local meetings of residents many registered their objections and concerns to City of York Council. The Parish Council also submitted a detailed letter of objection.

29. Despite the considerable number of objections and responses across the city of York to the draft Preferred Options Local Plan, the Publication Draft of the Local Plan was substantially unchanged from the Preferred Options Draft. The Publication Draft of the City of York Local Plan was halted from progressing to consultation by the full Council at its meeting on 9 October 2014 to review the overall housing requirements included in the plan. Since that date further work on housing and employment requirements have been undertaken to take account of the latest Government statistical releases and updates to the evidence base. In addition further work around determining a permanent Green Belt for York has also been undertaken.

30. This resulted in the publication in July 2016 of a revised City of York Council Preferred Sites Consultation Local Plan which itself was superseded by the publication in September 2017 of the City of York Local Plan Pre-Publication draft Local Plan and recently, February 2018, the City of York Local Plan Publication draft. This document seeks to identify sufficient land to accommodate York's development needs across the plan period, 2017-2037, and establishes a green belt boundary enduring 20 years. Significantly for the Parish of Earswick the draft Local Plan no longer has any land designated as "safeguarded". In addition the plan does not propose to allocate any land within Earswick for future development.

**31. These proposals are entirely in line with the wishes of Earswick residents and the recommendations of this Neighbourhood Plan that**

**there should be no changes to the draft Green Belt boundary within the parish boundaries, nor that the Parish is a sustainable location for development allocations.**

#### **1.4 How the Neighbourhood Plan has been Prepared**

32. The Plan has been prepared by residents and members of the Earswick Parish Council working as part of a Neighbourhood Plan Working Party with support from the City of York Council and consultants *Yourlocale*. The process has involved a number of key steps:

##### **Designation and Raising Awareness**

33. Earswick Parish Council took the decision to produce a Neighbourhood Plan at its meeting on 3<sup>rd</sup> November 2014 in response to the Government's publication of the Localism Bill. Following a community introduction workshop in March 2015, to which all residents of the Parish were invited, the Parish Council formally agreed to develop a Neighbourhood Plan for Earswick at its meeting on the 20<sup>th</sup> April 2015.

34. The Parish Council established a Working Party, formed from members of the local community and parish council representatives to oversee the process of preparing the Plan. Terms of reference and membership of the Working Party were approved by the Parish Council at its Annual Meeting in May 2015.

35. In December 2015 Earswick was designated by City of York Council as a Neighbourhood Planning Area.

36. Progress on the Plan was communicated to residents by newsletters, on noticeboards, through open meetings and on a section of the Parish Council website dedicated to the Neighbourhood Plan.

##### **Consultation and Evidence Gathering**

37. The policies within this plan are based on a significant body of evidence and robust community engagement.

38. During 2015/2016/2017 over 230 people attended five public open meetings and exhibitions held in the Parish. Participants were asked what they liked and disliked about the Parish, how they would want to see it evolve and the benefits new development should bring to the community. Further to ensure the consultation process was as inclusive as possible the working party also sought the views of Earswick residents and local businesses via two detailed full Parish Neighbourhood Resident Surveys. In both cases over 60% of those surveyed responded, which is a very good response rate.



39. The Working Party mobilised themselves to begin the process of gathering evidence to support the Plan. This included reviewing evidence reports prepared by City of York Council and preparing a neighbourhood profile using key national and local statistics.

40. Further details of the consultation and engagement undertaken can be found in the Statement of Consultation, which is available on the Parish Council website under the dedicated Neighbourhood Plan section.

#### **Vision and Objectives Development**

41. Following analysis of the August/September 2015 consultation exercise and evidence gathering, a Vision and Objectives document was drafted for comment. The document was sent to every household in the Parish during April 2016.

#### **Draft Plan Creation**

42. During May to August 2016, a draft Neighbourhood Plan (Version 1) was produced based on consultation outcomes and sound evidence. Consultants *YourLocale* were used to support this process. A copy of this draft plan was made available to every household in the parish, either by viewing on the Parish Council website or on a hard copy on request. Public exhibitions of the proposals were also held in the village hall in October and December 2016.

43. An initial pre-submission consultation of residents, landowners, businesses and agencies was carried out in November/December 2016. Where appropriate amendments/additions were made to the draft plan. A further pre-submission version of the draft plan (Version 2) was produced in September 2017 as a result of the publication of the updated City of York draft Local Plan and the introduction of a specific policy dealing with the extent of the draft Green Belt. A copy of the updated version of the draft plan was again made available to every household either via the Parish Council website or a hard copy on request. A public exhibition of the revised proposals for both residents and representatives of the statutory bodies was held on the 15<sup>th</sup> December 2017 in the village hall. The second pre-submission consultation took place between December 2017 and February 2018. Again where appropriate amendments/additions were made to the Plan.

Copies of the responses from both consultations can be viewed on the Parish Council website and in the Consultation Statement document.

## 1.5 Pre-submission Consultation

44. Following the amendments to the initial pre-submission draft plan, based on the earlier feedback, and updating of the plan in line with the recently published City of York draft Local Plan the Parish Council invited residents, landowners, businesses and agencies to give their views on the draft of the revised Neighbourhood Plan. This consultation took place between December 2017 and February 2018.

45. Hard copies of the Draft Plan and Representation Forms were made available from:

The Clerk to the Council, Joanne Fisher: Tel: 01904 758615 or email: earswickclerk@aol.com

46. The Draft Plan, Representation Forms and other background documents are also available for viewing and downloading from the Neighbourhood Plan website:

<http://www.earswick.org/neighbourhood-plan/?drawer=Neighbourhood%20Plan>

47. A Representation Form was provided for comments, but the Parish Council also welcomed comments by email or in writing. Completed forms and other comments in writing were returned to:

The Clerk to the Council, Joanne Fisher, 24 Lock House Lane, Earswick, York, YO32 9FT.

48. Following the public consultation process on the Draft Neighbourhood Plan, the Plan has been amended and submitted to City of York Council together with supporting documentation, including a Strategic Environmental Assessment, Basic Conditions Statement and Consultation Statement setting out who had been consulted, how the consultation had been undertaken and how the representations received had informed the Plan.

49. City of York Council will re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made to the Plan it will be subjected to a local referendum, and then "Made" by City of York Council and used to determine planning applications in Earswick Parish.

## 2.0 Earswick Parish

50. Earswick is a small North Yorkshire parish on the riverside setting of the River Foss. Located on the York to Strensall Road. Earswick is one mile south of Strensall and four miles north of the city of York. York's nearby outer ring road (A1237) offers access to the Leeds/Scarborough A64 and the Thirsk/Teesside A19.

51. Originally a collection of farm buildings, which has evolved into a village, the ancient township of Earswick or Edresuic, as it was known before the Norman Conquest, is named from the Anglo-Saxon meaning "dwelling or farm of a man called Aethelric".

52. Earswick is also specifically mentioned in the Great Domesday Book (1086) where records show that "three geld carucates (about 360 acres) of land in Earswick held of St Peter by Sasford and Godric before the Conquest belonged to the See of York and afterward formed part of the manor of Strensall".

53. The village later came to prominence with the creation of Earswick Landing, where coal was brought into the area along the River Foss.

54. The early and mid 20th Century saw Earswick change very little. It remained very much an agricultural village with the population increasing only slightly to around 230. Apart from several farms along the Strensall Road the majority of housing was still located on a ribbon of land off the main York to Strensall Road, leading down to the River Foss, known as The Village.

55. But the late 20th century saw a decline in employment in agriculture coinciding in the late 1970's with the growth of the Parish as home to a significant number of professional people working in the York area following the building of housing in Shilton Garth Close, Stablers Walk and Rowley Court.

56. One of the most significant events in the history of the Parish occurred in the 1990's when the local pig farm obtained planning permission for the construction of 125 homes on what is now the Fosslands estate, almost doubling the size of the village. It did, however, enable the Parish to gain a much needed village hall, tennis courts and a bowling green (now the Scented Garden) although it was at this time that, like many small parishes throughout the country, it saw the disappearance of its village shop.

57. Uniquely the Parish has never had a church, school or a public house.

58. Despite being so close to the city of York the Parish still provides an attractive semi-rural environment in which to live surrounded by over 30 acres of public open space with designated footpaths and tranquil riverside walks, a scented garden, tennis courts, play areas, a village hall and village green complete with a maypole.

59. Shops at nearby Strensall and Huntington cater for daily needs, whilst the shopping centres of Clifton Moor, Monks Cross and Vangarde are less than 2 miles away.

60. Schools for both primary and secondary school children are located in nearby Huntington and Earswick residents have burial rights in the cemetery in Huntington.

61. The Parish had a population of 876 and 346 households at the time of the 2011 Census. It has a higher than average proportion of older residents, with over 19% aged over 65 compared with 17% for York as a whole and the 16.3% national average.

62. The economic activity rate is higher than that of York and England as a whole, and 88% of residents reported to be in good or very good health, which is also somewhat higher than the York and national averages.

63. Home ownership levels are particularly high with over 93% of households being owned outright or with a mortgage or loan against 66% for York and the 63% national average.

64. Privately rented households represent just 5% of households compared with 17.9% for York and 16.8% for England as a whole.

65. The whole of the Parish outside of the village of Earswick is 'washed over' by the draft Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and rural in character.

## 2.1 Key issues and opportunities

66. The key issues and opportunities raised by the community and identified by the Neighbourhood Plan Working Party that the Plan will seek to address are as follows:

- There is a real appreciation for living in Earswick and surrounds;
- Whilst there is a willingness to embrace change and progress, there is a desire that if any development takes place it ensures that the special character of Earswick is retained and wherever possible enhanced; and
- The majority of residents do not want to see any housing development on the draft Green Belt but in the event that some development does occur, they feel it is essential that policies be in place to reflect the wishes of the community.

### 3.0 Our Vision and Objectives

67. Based on the community consultation undertaken as part of the Parish Plan (2012), the two Resident Surveys (2015/16) and the evidence gathered, the Working Party prepared a vision for Earswick which reflects the local community's aspirations for the future of the Parish. The community wants Earswick to continue to thrive as a vibrant and distinctive Parish, to continue to respect and reflect the views of its community, to evolve and expand, where appropriate, whilst retaining its unique and distinctive character and to provide an outstanding quality of life for current and future generations of residents.

68. The proposed vision for Earswick is as follows:

#### **Our Vision:**

Earswick Parish will be a desirable place to live for all residents based on its distinctive, semi-rural character and open space, safe and secure environment and community spirit.

69. A series of Objectives have been established to help realise the Vision for Earswick and to provide a policy framework to guide the development necessary to deliver it.

The Objectives of the Neighbourhood Plan will be to:

- Ensure that the parish continues to be a safe and secure place in which to live;
- Protect our open space and the landscape;
- Seek on-going improvements to public transport facilities, road and pathway conditions;
- Deliver modest housing development (on brownfield sites) that is sensitive to the environment, infrastructure constraints and improves the quality of life for all current and future residents; and
- Maintain and improve local facilities for all residents.

## 4.0 Neighbourhood Plan Policies

70. The following policies has been developed to manage the future development of Earswick Parish in order to achieve the vision and objectives of the Neighbourhood Plan.

71. The policies are defined under five themes; reflective of the topic areas raised during consultation and addressed as part of the research process. The themes are:

- Housing Development
- Landscape and Environment
- Local Facilities
- Transport and Highways
- Safety and security

72. Decision makers and applicants must accept the policies **together** when judging if a proposal would be acceptable.

73. To aid interpretation, for decision makers and applicants, each policy is accompanied by supporting text setting out the context and justification for the policy. All policies have been framed in the context of the National Planning Policy Framework and the emerging Local Plan for the City of York.

74. While every effort has been made to make the main parts of this Plan easy to understand, the wording of the actual policies is necessarily more formal, so that it complies with statutory requirements.

75. It should also be noted that the Plan does not duplicate national or district (i.e. City of York) planning policies. Its policies will work alongside these, adding local, more detailed, Earswick Parish specific policies that reflect and articulate the needs and aspirations of the community. Where there are national and City of York planning policies that meet the needs and requirements of the Parish, they are not repeated in the Plan.

#### **4.1 Housing Development**

**76. The objective of this policy is to: Deliver modest development that is sensitive to the environment, infrastructure constraints and improves the quality of life of all current and future residents**

77. This will be achieved by ensuring that any new housing development approved within the Parish respects the existing form and function of the various settlements within the village and meets local needs.

**78. The following plans, documents and strategies support this policy:**

- National Planning Policy Framework
- Draft City of York Council Local Plan
- Planning Policy Guidance
- Earswick Parish Plan

#### **Justification and Evidence**

79. Housing development is a top priority and concern of the local community.

80. The City of York Local Plan, when approved, will set out the overall housing target for the City of York between 2017 and 2037 as well as the supply of sites required to meet this need.

81. Legislation requires that a Neighbourhood Plan must be in general conformity with the Local Plan and its contents. This includes ensuring that the Parish makes its full and proper contribution to meeting any City of York wide housing target.

82. Determining how much of this requirement for new dwellings across the City of York this Plan should cater for is complicated by the absence of an approved up to date Local Plan.

83. City of York Council, however, has issued a Local Plan Publication draft, the contents of which are expected to form the basis of the final Plan.

84. The focus of the policies in the draft Local Plan with regard to the Parish is to protect and enhance its character and the openness of the countryside within it.

85. This draft Local Plan does not generally consider Earswick Parish to be a suitable and sustainable location for new housing development.

86. In part this reflects that any significant housing (or other development) would require building on land that is currently in the draft Green Belt, which would be counter to established Green Belt planning policies (which only allows the development in the Green Belt in exceptional circumstances).



87. It also reflects that there are better and more sustainable locations for development, especially within and on the edge of the built up part of York; the need to protect the countryside and that any development in Earswick will inevitably lead to more (and unsustainable) journeys by car.

**88. The emerging draft Local Plan does not recommend a specific new housing requirement (or supporting housing allocation) for the Parish.**

89. Generally, it is considered that any development that takes place in the Parish should be small scale and meet local needs. It should also not have a detrimental impact on the character of the Parish or on the openness of the draft Green Belt.

**90. The view that the Parish is not generally a suitable and sustainable location for new housing building is strongly shared by the Neighbourhood Plan and the local community.**

91. However, from time to time, there will be development opportunities on brownfield sites or infill development for housing and other forms of development. It is important that the Neighbourhood Plan is able to guide such development.

92. A survey of all 347 households in the Parish was carried out in September 2015 by the Parish Council's Neighbourhood Working Party to assess opinion on a wide range of planning and other issues as well as the further development of the village.

93. A total of 219 responses (63% of total households) were received.

94. There was a mixed response regarding housing provision with the majority (61%) indicating they didn't want any future developments compared to others who declared an appetite for generally some smaller scale developments. Those resisting future housing developments voiced concerns about protecting the green belt/open spaces, infrastructure issues and retaining the current Parish characteristics. Others acknowledged the demand for more homes and the importance of having a good quality supply to include sustainable and affordable, housing to cater for all age groups. This response reinforces an almost identical result from the survey carried out in 2012 for the Parish Plan.

95. This result is not perhaps surprising given that the whole of the area around Earswick is currently draft Green Belt, (which acts as a barrier against creating further urban sprawl and coalescence with neighbouring villages) and the proposal contained within a previous iteration of the City of York Council draft Local Plan (2014) to build 2,000 houses within the Parish that would completely swamp the existing dwellings and alter the character of the village beyond recognition.

96. The representatives of the Neighbourhood Plan Working Party met with officials working on the City Council Local Plan and discussed with them the results of the residents' survey.

97. It is recognised that there is a risk that any target adopted by the Plan in advance of the Local Plan might need to be reviewed should the final Local Plan set a higher housing growth target for the Parish than the draft Plan recommends. It is considered that the risk of this is small, but should this be the case the Plan will be immediately reviewed.

98. It was considered putting the development of the Plan on hold until the Local Plan had been approved. It was felt that this was not appropriate. There were a number of reasons for this. The most significant was, based on the current timetable set out by the City of York Council, it could be two years or more before the final Local Plan is agreed, and in the meantime the Parish could be subject to speculative planning applications, whilst the Local Plan was being considered and agreed

99. The Plan recognises, however, that while the draft Local plan does not identify a specific housing requirement for the Parish, there may be opportunities for further small scale, limited housing development in suitable and sustainable locations.

100. Windfall sites are typically small infill or redevelopment/conversion sites that come forward unexpectedly, and which have not been specifically identified for new housing in a planning document such as Local Plan or Neighbourhood Plan. Normally windfall development is for new housing though could comprise other forms of development such as shops, employment or community facilities.

101. These sites often comprise redundant or underutilised buildings, including former farm buildings, or a small gap within an existing frontage of buildings and can range from small sites suitable for only a single dwelling to sites with a capacity for up to five dwellings. In principle, national and local planning policies enable windfall development in the Green Belt.

102. Recent examples of windfall development in the Parish include the re-development of a single dwelling into two dwellings and the conversion of a farm building into houses.

103. Such sites have made a regular contribution towards the housing supply in the Parish at an average of under 1 new dwelling a year.

104. It is recognised that there remain opportunities for such windfall development over the lifetime of the Plan.

105. It is also recognised that many in the community would like the Plan to take a zero growth approach to housing development over the next twenty years. This would mean the Plan would seek to prevent any housing

development, however small. This is considered inappropriate and potentially unlawful.

106. Whilst the brief of the Working Party is to represent the wishes of the residents of Earswick Parish, it is also equally important that we highlight the potential consequences of taking forward the Plan with zero housing growth over the next 20 years.

107. Limited carefully controlled housing development can sometimes bring wider benefits, such as the redevelopment of brownfield sites, securing the on-going use of a building and providing much needed affordable homes. It is also important that the Plan plays its part in meeting City of York and national housing requirements.

108. Furthermore, it is national planning policy that carefully controlled windfall development is not only appropriate (including in principle in the Green Belt) but also desirable. A policy to refuse any development in the Parish would be more than likely considered unreasonable by a Neighbourhood Plan examiner. This would mean that the Plan and the policies within it would not be progressed. Furthermore, in the highly unlikely event that such a policy passes neighbourhood plan examination, if it was used to refuse new housing development, such a decision is likely to face a legal challenge or overturned on appeal if a developer were to appeal against this effective ban on new housing development.

109. It is good practice, and common sense, therefore, to ensure that any plan that is being developed for a period as long as 20 years into the future should be robust enough to cater for any eventuality and meets any legal and other requirements.

110. The Plan cannot, nor does it seek to, prevent this type of development, but seeks to positively guide and influence any such future development proposals. Generally, any windfall development should be small scale and meet a local need. It should also be compatible with, and where possible, enhance the special and distinctive qualities of the Parish, including its built and natural environment.

111. In particular, the supply of any new homes in the Parish must be realised in accordance with the distinctive features, scale and grain of the local area that harmonises with the existing character of their setting and buildings. Housing sites must be carefully considered and will only be acceptable where they reflect these principles and are consistent with the Plan taken as a whole.

**POLICY ENP 1: WINDFALL HOUSING DEVELOPMENT - It is accepted that there may be some windfall developments over the Plan period. Development proposals for small scale (normally for a single dwelling) infill development and the re-use of previously developed (brownfield) land or buildings, which is consistent with the sustainability of the Parish, will be supported where it:**

- a) Reflects the size, character and level of the infrastructure service provision of Earswick.**
- b) Meets a clearly identified need for the Parish;**
- c) Retains existing and wherever possible enhances natural boundaries such as trees, hedges and streams which either contribute to visual amenity or are important for their ecological value.**
- d) Does not reduce garden/green space to an extent where it would significantly adversely affect the character of the area or the amenity of the proposed occupiers of the new development or adjacent properties/uses.**
- e) Does not have a significant adverse effect on neighbouring properties or uses by way of privacy, daylight, noise, visual intrusion, overshadowing or amenity.**
- f) Does not result in an unacceptable direct or cumulative adverse impact on congestion or road and pedestrian safety.**
- g) Has minimised and managed the risk of flooding both on and off site.**
- h) Is in accordance with other relevant policies, including Green Belt.**

112. Delivering a choice of high quality homes is essential to support sustainable, mixed and inclusive communities.

113. This will underpin a well-balanced population that is vital to the on-going viability of the Parish, particularly in light of the community's increasingly ageing population.

114. This is especially important in Earswick Parish as there is strong evidence from the Census and other sources that there is an imbalance in the housing stock with a relative over provision of larger properties (3 or more bedrooms) and a relative under provision of smaller properties (less than 3 bedrooms). At 66.8% the proportion of dwellings with 4 or more bedrooms in the Parish is more than three times the City of York average (22.1%) and three and a half times the England and Wales average (19.0%).

115. In the second survey, two-third of households agreed or strongly agreed with the statement that the Plan should "Ensure any new housing broadens the range of stock available in the Parish; the type and cost of new housing should meet the housing needs of the local area for now and into the future".

116. Any housing development must therefore provide a mixture of housing specifically to meet the needs of the community. A copy of the Report: An Assessment of Housing Needs and Characteristics in Earswick Parish is available from the Parish Council website.

**POLICY ENP 2: HOUSING MIX – New housing development will be required to demonstrate how it relates to the existing need for smaller homes (three bedrooms or less), or the needs identified in an up to date assessment of housing need.**



117. The River Foss runs along the western boundary of the Earswick Parish application area and together with the surrounding area lies within Flood Zone 3 (FZ3) as defined by the Environment Agency. Areas within Flood Zone 3 have been shown to have a greater probability of flooding. The Plan does not consider that development within Flood Zone 3 is desirable or sustainable in the longer term, a policy position that reflects national and local guidance about development in Flood Zone 3. The area affected by the flood zone consists entirely of green open public space. The Neighbourhood Plan, Policy ENP 5, recommends that this area be retained and protected as a Local Green Space (G2) and as such any development proposals for this area should be subject to ENP Policies ENP 3 and ENP 5, which would rule out most forms of development.

Map 2 identifies the extent of Flood Zone 3 within the Earswick Parish boundary.

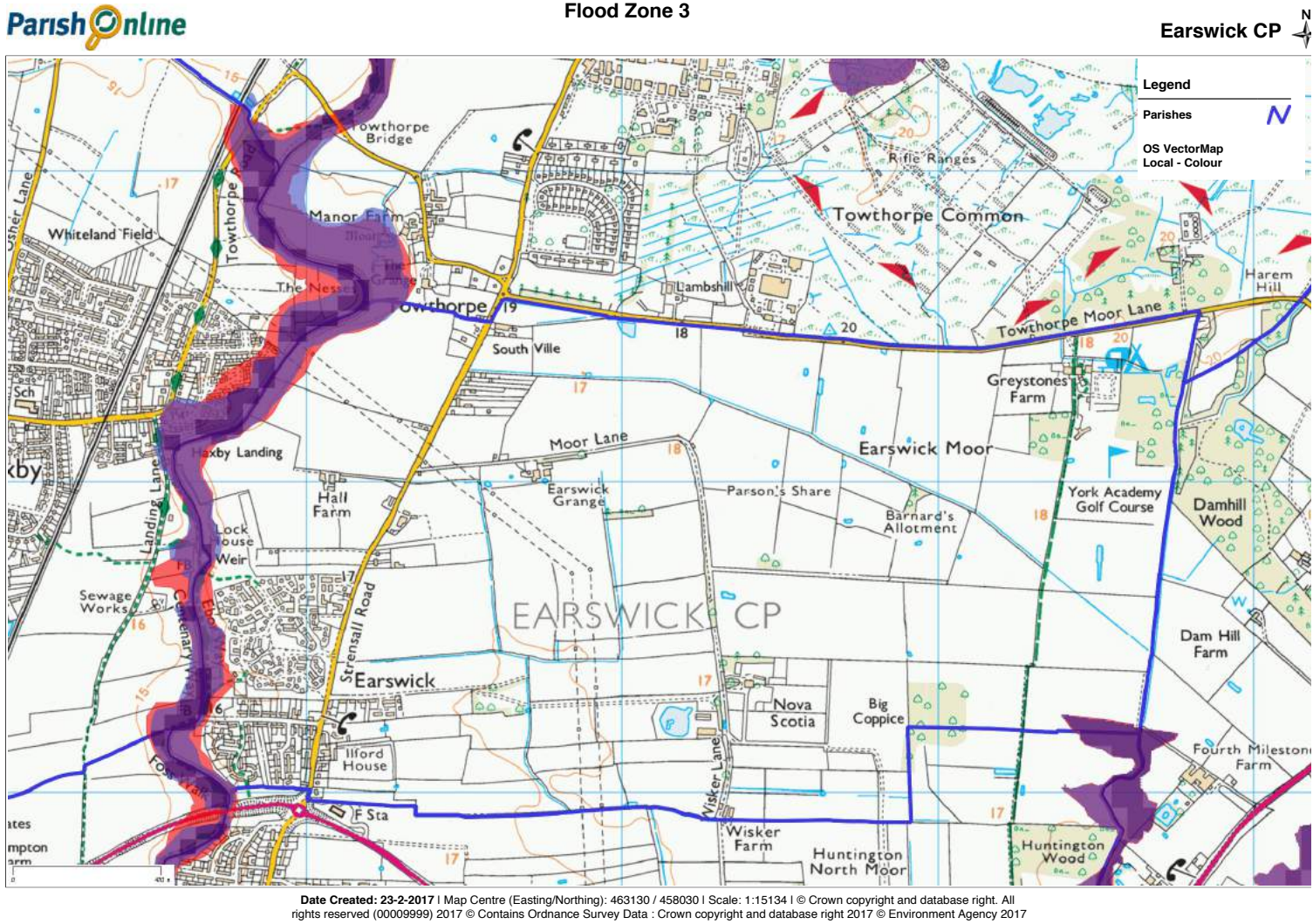
**POLICY ENP 3: Flood Risk and Climate Change - Development proposals in high flood risk areas should be avoided, wherever possible, and will not be supported other than in exceptional circumstances in accordance with City Council and National planning policies and Environment Agency strategic flood risk assessments. Developers should consider the need for a Flood Risk Assessment (FRA) and the provision of sustainable drainage systems in line with PPG25.**

**Climate change will increase flood risk. Developers will be encouraged to mitigate against this risk and help the environment by reducing emissions and improving air quality by:**

- a) Installation of efficient water and waste management systems in new buildings.**
- b) Use of locally sourced wood fuel for heating.**
- c) Promotion of the use of sustainable materials in construction.**
- d) Encouraging energy efficient measures for new builds.**



Map 2 - Extent of Flood Zone 3 within the Earswick Parish boundary.



## 4.2 Landscape and Environment

118. The overall objective is to protect our open space and landscape.

119. This will be achieved by ensuring that this policy supports existing European and National legislation with regard to nature conservation and to provide an additional layer of protection by ensuring that any potential new development within the village is encouraged to mitigate any possible harmful impact on the existing natural environment.

120. **The following plans, documents and strategies support this policy:**

- European legislation
- National legislation
- National Planning Policy Framework
- Planning Policy Guidance
- Draft City of York Council Local Plan
- Yorkshire and Humber Regional Spatial Strategy

### Justification and Evidence

121. Earswick is a semi-rural parish. Whilst the main village has seen development during the second half of the 20<sup>th</sup> Century, the Parish remains mainly green and rural in nature.

122. Today it is one of the most attractive and least spoiled of the parishes in the north of York.

123. Its 'greenness' reflects not only the large areas of open countryside surrounding the village of Earswick but also the open spaces to be found within the settlement.

124. These open green spaces, well-cultivated gardens, mature trees and hedgerows and green routes all combine to provide a valuable green infrastructure which plays an important role in delivering environmental sustainability, maintaining wildlife and bio-diversity, mitigating flood-risk, reducing the impact of climate-change and improving people's well-being.

125. Consultation shows that the underdeveloped and rural nature of much of the Parish is highly prized and appreciated by residents as well as the wildlife and wildflowers it supports.

126. A key part of the Plan process involved undertaking a detailed assessment of the landscape character of the Parish.

127. The Parish lies within the Vale of York Landscape Character Area, as defined by Natural England. Areas of relatively flat, low-lying land surrounded by higher land to the north, east and west, typify the landscape of this Character Area. The high quality soils to be found across most of the Landscape Character Area mean that arable cultivation is the predominant



land use. Due to its generally low-lying topography, the landscape provides for open views across the surrounding countryside, including towards the city of York. It is an area that is unlikely to be able to accommodate development without an adverse impact on the existing landscape.

128. The rural setting of Earswick Parish is highly valued by local people. It is key to its village feel and green and leafy surroundings, making it an attractive, distinct and enjoyable place to live, work and visit.

129. In planning terms, land outside the main built-up areas is treated as countryside. This includes any small group of buildings or small settlements that may be found there.

130. It is national and city planning policy that development in the countryside should be carefully controlled. One of the core planning principles of the NPPF (paragraph 17, point 5) is to support “the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”.

131. Over 80% of the Parish is designated as draft Green Belt.

132. The Parish lies within the York draft Green Belt. It circles the whole of the built-up part of Earswick and incorporates much of the surrounding countryside.

133. This plays an important role in determining the setting, character, and identity of the village of Earswick itself and also offers access to open countryside for both active and passive recreation. It also assists in urban regeneration, by encouraging the recycling of derelict and other urban land.

134. The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. National planning policy is clear in its support for the Green Belt. As the National Planning Policy Framework (NPPF) states: “*The Government attaches great importance to Green Belts*”. It also states that inappropriate development (such as the construction of new buildings), which is harmful to the role and function of the Green Belt, should not be approved except in very special circumstances. However within the Green Belt there are additional planning controls over the type of development that can take place, such as minerals extraction, engineering operations and local transport infrastructure. These types of development are excluded from the remit of the Neighbourhood Plan. Once an area has been designated as Green Belt, national planning policy is explicit that its boundaries should only be altered in exceptional circumstances.

135. Despite the fact that the York Green Belt is still, technically, a draft Green Belt it has, de facto, been in existence for several decades and has been reaffirmed on numerous occasions in planning refusals and dismissals of planning appeals. It was specifically recognised in the Yorkshire and Humber Regional Spatial Strategy (RSS) adopted in 2007 and although the RSS was substantially revoked by an Order (SI. No. 117 2013) made in early 2013

under the Localism Act 2011, policies which related to the York Green Belt were specifically excluded from the revocation.

136. Further, whilst not forming part of the Development Plan, the City of York draft Local Plan, incorporating the Fourth Set of Changes Development Control Local Plan (April 2005), was approved for development control purposes. The effect of this process is that decisions on planning applications falling within the general extent of the Green Belt (as defined in the RSS) are taken on the basis that land is treated as Green Belt.

137. Paragraphs 83-85 of the NPPF are clear that the identification and modification of Green Belt boundaries are matters for the Local Planning Authority to determine. In this case that authority is the City of York Council. Furthermore, these paragraphs identify that these processes should be undertaken as part of the preparation or review of a Local Plan. In this case, this would be through the vehicle of the preparation of the emerging City of York Local Plan.

138. At the same time, the Neighbourhood Plan needs to be in general conformity with the strategic policies of the development plan. In this case, these are policies YH9 and Y1 of the Yorkshire and Humber Regional Spatial Strategy. These identify the general extent of the York Green Belt and set out its national significance.

139. In these circumstances, this Neighbourhood Plan continues to apply, and strongly supports, the approach to the identification of the Green Belt as set out currently in the RSS and the Fourth Set of Changes Development Control Local Plan (2005) on an interim basis until such times as the emerging Local Plan is adopted.

140. This will ensure that the preparation of the emerging Local Plan is used as the mechanism for the detailed identification of the York Green Belt boundaries in accordance with national planning policy. It will also provide the proper opportunity for residents, developers and other interested bodies to contribute to this debate both in general terms on the Green Belt boundary and to provide the agreed levels of development for the City.

141. The Working Party would stress that, in coming to a view on the final delineation of Green Belt boundary in the Local Plan, careful and significant consideration should be given to the general boundary identified in this Neighbourhood Plan (which is coterminous with the existing interim Green Belt boundary) and the strong level of technical work and consultation which underpins its identification. The compelling case for the confirmation of the existing draft Green Belt for Earswick (as shown on the Proposals Map) is a top priority for local people as evidenced in the detailed consultation undertaken as part of the Neighbourhood Plan's development.

142. Once the emerging Local Plan has been adopted, the Neighbourhood Plan will be reviewed in order to ensure that the Neighbourhood Plan and Local Plan are consistent on this important matter.

**POLICY ENP 4: GREEN BELT – The general extent of the York Green Belt within Earswick Parish is shown on Map 3 – the Proposals Map.**

**Within the general extent of the Green Belt inappropriate development is by definition harmful to the Green Belt and will not be supported except in very special circumstances.**

**Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.**

**New buildings are regarded as inappropriate development in the Green Belt except in the circumstances identified in paragraph 89 of the National Planning Policy Framework (see Appendix 1) when due consideration will be given to their construction.**

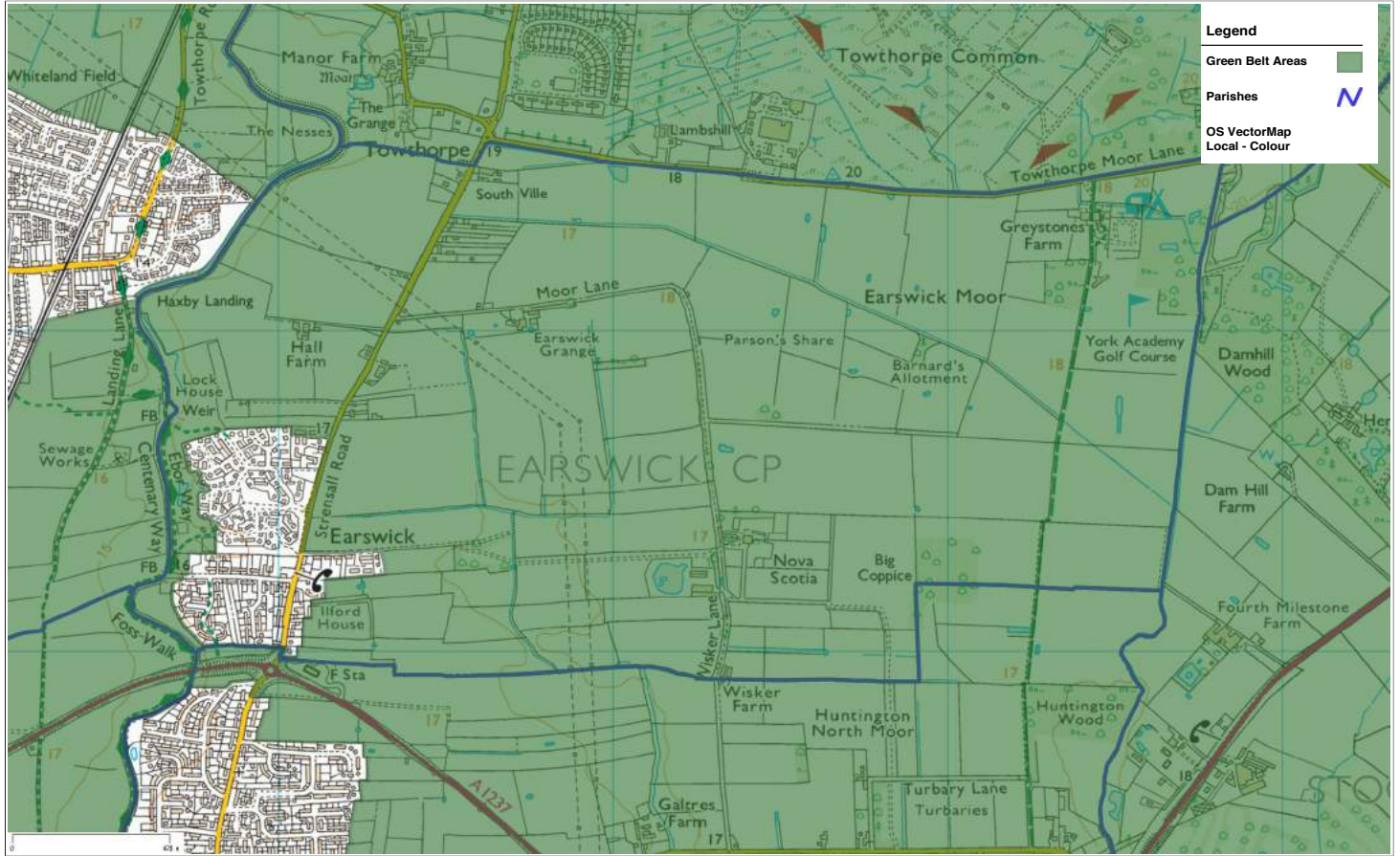
**It is recognised that there are additional planning controls contained within paragraphs 90-92 of the National Planning Policy Framework (see Appendix 1) covering the type of development that can take place within the Green Belt, such as minerals extraction, engineering operations and local transport infrastructure, which are excluded from the remit of the Neighbourhood Plan. Any such developments should still endeavour to preserve the openness of the general extent of the Green Belt and not conflict with the purposes of including land in the Green Belt.**

Map 3 - Existing (and Proposed interim) Draft Green Belt



Existing Draft Green Belt

Earswick CP



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143. The City of York Local Plan describes Green Infrastructure as “a collection of assets which provide multiple functions and services to people, the economy and the environment. These assets are of a great variety and span various spatial scales and include:

- woodland
- watercourses
- highway verges and railway embankments
- parks, playgrounds, allotments and other public open spaces
- farmland and market gardens
- urban trees
- private gardens
- the grounds of hospitals, schools and business parks
- sports pitches and recreational areas”.

144. The Parish retains a number of green spaces that contribute to this character and provides opportunities for informal and formal recreation.

145. A good example is the two relatively “new” estates of Fosslands and The Garden Village that were built in Earswick, during the last 20 years. They were designed and built with grassed areas within them and at the entrances to them. These areas provide relief to the built form of the village. They are an important feature in the village and contribute to its character, adding to the distinctive open feel and reinforcing the sense that you are in a village rather than an urban area.

146. The community wishes to see the most important of these spaces protected for future generations.

147. National planning policy enables a Neighbourhood Plan to designate areas of ‘Local Green Space’ for special protection where, for example, the land is demonstrably special to a local community and is not an extensive tract of land. With Local Green Spaces, there are strong planning controls over the type of development, which can take place within it. As the NPPF states, “By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances”.

To be designated as Local Green Space it must meet specified criteria as set out in the National Planning Policy Framework. This includes:

- where the green space is in reasonably close proximity to the community it serves
- where the green area is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife

148. The many green spaces across the parish were evaluated for Local Green Space designation by the Working Party. After careful consideration seven sites have been identified that are considered of special importance to the community and meet the criteria for designation as set out in national planning policy.

149. These are sites valued for many reasons such as their open access for Sport, Recreation and Amenity. They are areas where residents can come together and where community events are held. Within the areas of Local Green Space, (listed below and shown on Map 4), development is ruled out.

**POLICY ENP 5: LOCAL GREEN SPACES - The spaces listed below and shown in Map 4 are designated as Local Green Spaces. Development proposals that would result in the loss of, or have a significant adverse effect on, an identified Local Green Space will not be supported.**

G1 - Village Green, The Garden Village.

G2 – Earswick Public Open Space - open green space bounded between the River Foss and the built up areas that includes the Sports Field and Tennis Courts.

G3 - Earswick Scented Garden.



G4 - Village Green, Fosslands.

G5 - Land to the front of 6 Northlands, Earswick.

G6 – Centenary Wood.

G7 – Flower Meadow

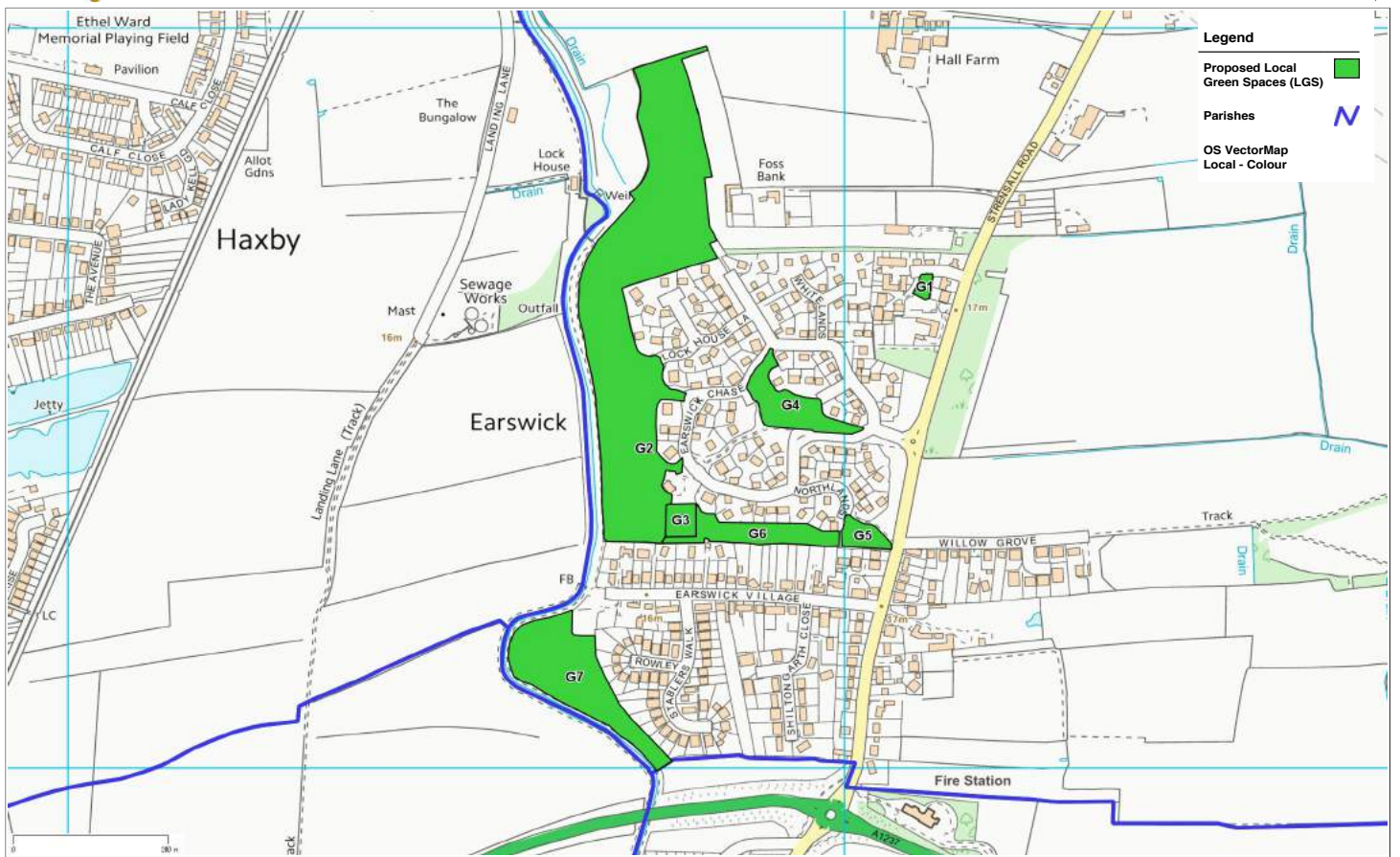


Map 4 - Proposed Local Green Spaces



Proposed Local Green Spaces

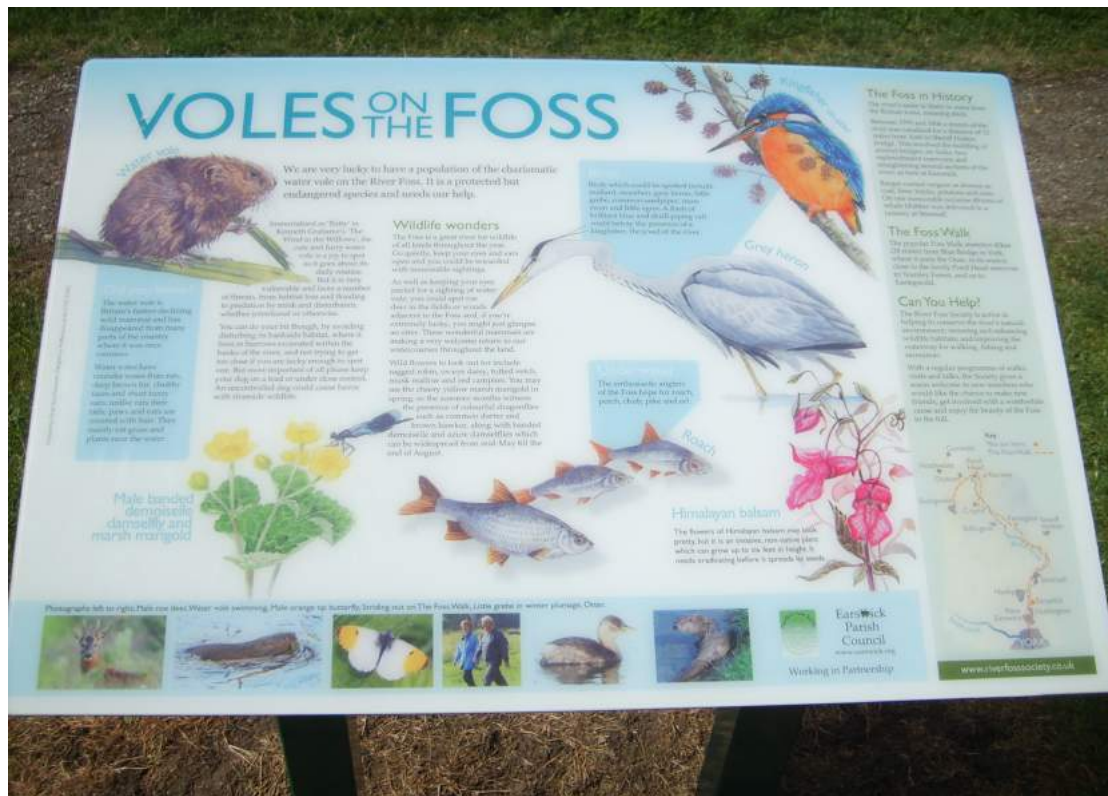
Earswick CP



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150. The natural environment and the biodiversity that the open countryside supports are important to the village. In addition to its 30 acres of public open space the village also has a number of nature conservation areas located throughout the area that are easily accessible via a series of natural pathways. Local distinctiveness contributes to a sense of place. Community and natural features such as small woodlands, in-field trees, hedgerows, ponds and meadows are significant landscape components, which distinguish the village. So the retention of their character is a key element in achieving sustainable development.

151. These natural features are also a source of a diverse range of significant local plant life and wildlife. This includes species and habitats that have been identified as locally important priority sites for conservation action through



respected reports and studies, including the UK Biodiversity Action Plan (BAP) and the York Biodiversity Action Plan.

152. The Parish's open fields support brown hare and in the damper patches, birds such as snipe and mallard. Hedgerows in the Parish form important corridors for wildlife including badgers, deer and foxes; small birds such as finches, great tits and blue tits; dragonflies and butterflies. Small woodland areas also provide important habitats for many species, including the tawny owl and great spotted woodpecker. Watercourses also provide an important wildlife habitat for otters and water voles whilst the Flower Meadow, a wetland 'nature reserve' contains a great diversity of plant and animal species including the endangered Great Crested Newt.



153. Through the development of the Plan, three sites considered of special nature conservation interest have been identified. Discussions are taking place with the City of York Council about the designation of these sites as Sites of Local Interest as part of the development of the Local Plan. These sites have also been designated as Local Green Spaces (Policy ENP 5).

**POLICY ENP 6: ECOLOGY and BIODIVERSITY – Development proposals should conserve, enhance and incorporate biodiversity in and around them. This is especially important where it relates to the locally important biodiversity priority sites and habitats, ecological networks and features (such as waterways, hedgerows and trees), included in the sites listed below and shown in Map 5.**

EB1 – Centenary Wood

EB2 – Flower Meadow

EB3 - Village Pond

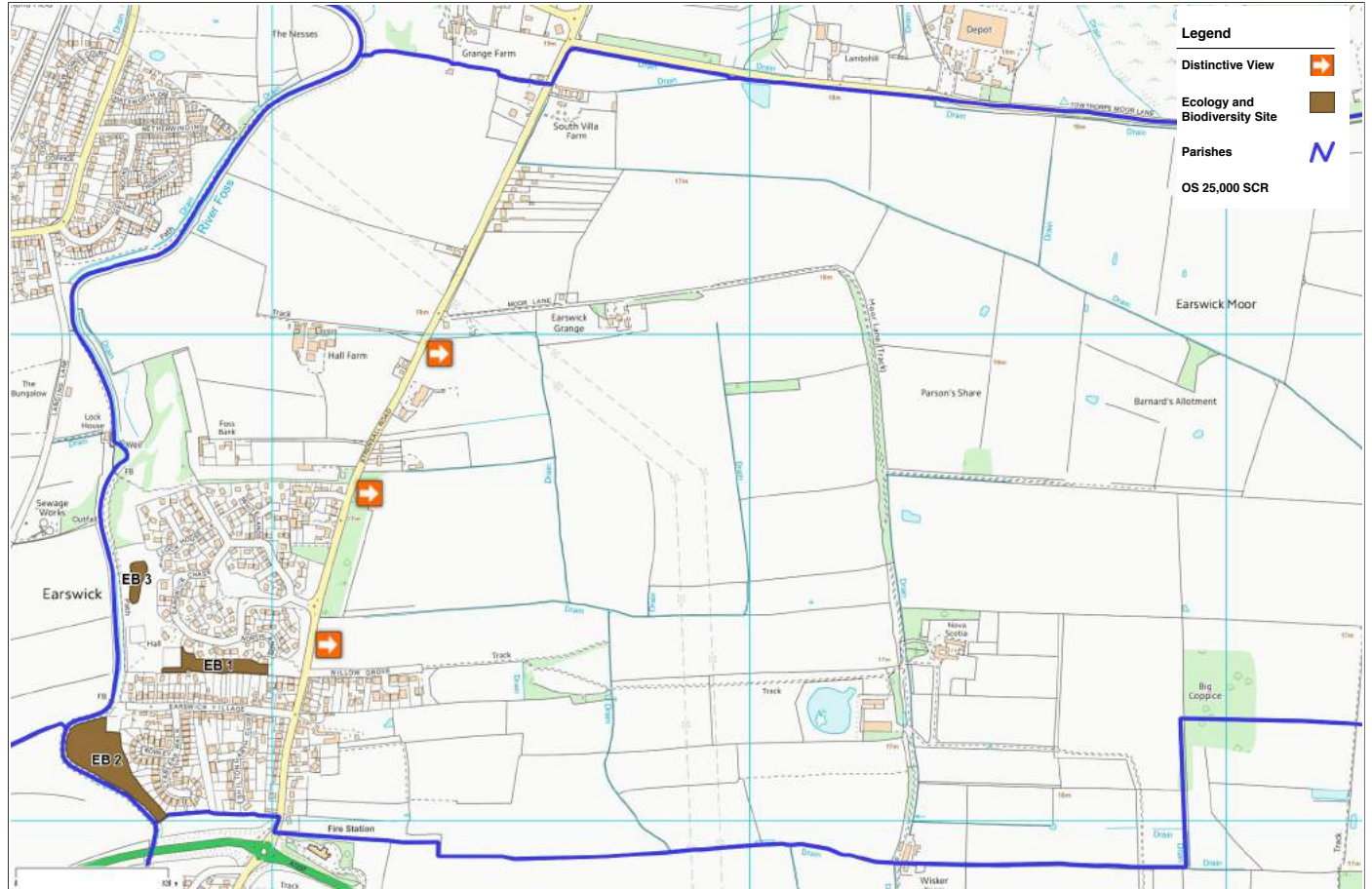


Map 5: Ecology and Biodiversity Sites and Distinctive View



Ecology & Distinctive Views  
Ecology and Biodiversity Sites and Distinctive Views

Earswick CP



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154. Its relatively open and rural landscape means that attractive long open views from, into and within the Parish can be obtained from almost anywhere. This openness - the ability to see open countryside and the natural horizon – is much prized by Earswick residents.

155. This is particularly the case along the eastern boundary of the village, which offers a broad vista towards the historic Earswick Moor, containing many natural and built features of interest.

156. It is essential these important views should be protected through careful siting, design and the use of appropriate scale in any new development. The emotional and spiritual value of this open land to the people of Earswick should not be underestimated.

157. It should be noted that whilst there are other distinctive views in the parish these are, for the most part, located along the western boundary of the village looking towards the neighbouring village of Haxby and as such couldn't be included in this neighbourhood plan as this lies outside the Parish's application area.

**POLICY ENP 7: DISTINCTIVE VIEWS - Development proposals should respect and wherever possible enhance the distinctive views identified on Map 5 by ensuring that the visual impact of development on these views is carefully and sympathetically controlled.**



View eastwards from Strensall Road, between Willow Grove and Earswick Chase that gives a stunning 180-degree panoramic view of Earswick Moor. Location shown on Map 5.

158. The Parish has a rich variety of trees and hedgerows, which add greatly to its special character and appearance. This includes areas of (deciduous) woodlands mainly to the east, as well as hedgerows, and individual trees that are to be found across the Parish.

159. A significant amount of local work has taken place over recent years to maintain and enhance the features that make Earswick unique. In 2012 the community planted over 700 trees to mark the Queen's Diamond Jubilee. Two years later a further 100 trees were planted to commemorate the 100 year anniversary of the start of the First World War.

160. There has been concern locally about the loss of trees with amenity value within the village. Such trees contribute significantly to the attractiveness of the village and every effort should be made to retain them.

161. In particular, any future new development, as well as incorporating new tree planting and landscaping, schemes, should be designed to safeguard any existing significant trees, including allowing sufficient distance between them and new buildings to avoid later pressure for their removal. Where new trees are to be introduced the focus should be on native species.

**POLICY ENP 8: TREES AND HEDGEROWS – Opportunities to enhance the coverage of trees and hedgerows (especially of species native to the York area) will be supported. Trees and hedgerows of good arboricultural, biodiversity and amenity value should be protected from loss or damage as a result of development. Where possible they should be integrated into the design of development proposals. Development proposals should demonstrate how they have taken account the need to protect existing trees and hedgerows of good value.**

162. Whilst agriculture remains the principal land use in the Parish, the character of the local landscape is also defined by its buildings.

163. There is one building in the Parish that is nationally 'Listed' in recognition of its special architectural and historic interest. This is Rose Cottage, a building of seventeenth-century origin.

164. In addition to this nationally designated heritage asset the consultation has identified other features of local importance that the community wishes to see conserved and appreciated. These are the Village signs as you enter Earswick. They are of pleasant and good design and important to the character and identity of the Parish





Rose Cottage

165. National and City of York planning policies enables a community to offer such assets some level of protection by identifying them as locally important heritage asset.

**POLICY ENP 9: BUILDINGS AND STRUCTURES OF LOCAL HERITAGE INTEREST – The Plan identifies the buildings and structures listed below as Earswick Character Buildings and Structures of local heritage interest.**

**Development proposals will not be supported that harm the historic significance and setting of Earswick Character Buildings and Structures.**

**Development proposals will be required to take into account the character, context and setting of these locally important assets including important views towards and from them. Development will be required to be designed appropriately, taking account of local styles, materials and detail.**

**The designation of these buildings and structures as part of a “Local Heritage List” by City of York Council is supported.**

- Earswick Parish Sign(s)



### 4.3 Local Facilities

166. The overall objective of this policy is to maintain and improve local facilities for all residents.

167. The Policy will ensure that the current level of services enjoyed within the Parish is retained and, where appropriate, new services and facilities can be added in the future.

168. Proposals for development will be required to identify their likely impact on local infrastructure, services and facilities and to demonstrate how any such impacts will be addressed.

169. **The following plans, documents and strategies support this policy:**

- National Planning Policy Framework
- Draft City of York Council Local Plan
- Planning Policy Guidance
- Localism Act

### Justification and Evidence

170. With increasing mobility the viability of many rural services has declined significantly over the past fifty years. Many villages close to York have a poor range of retail and community services, as local residents increasingly use the larger retail outlets located within and on the periphery of the city.

171. Earswick is no different and relies mainly on its larger neighbouring villages of Strensall, Huntington and Haxby to provide local services such as health facilities, schools and shops. Three nearby large shopping parks at Clifton Moor, Monks Cross and Vangarde provide access to national retail outlets.

172. Earswick does however have an abundance of green spaces including 30 acres of open space with its children's play area, junior football pitch and exercise equipment, tennis courts and a village hall where a number of community events take place, including a thriving seniors monthly coffee morning.

173. These buildings and green spaces, and the activities and services they support, play a vital role in meeting the health, welfare and social needs of the residents of the Parish and fostering (and acting as the focal point for) community spirit and pride.

174. To improve the attractiveness and sustainability of the Parish it is essential that Earswick retains and provides local services that will sustain the vitality of the community and encourage local spending.

**POLICY ENP 10: PROTECTING IMPORTANT COMMUNITY FACILITIES –**  
Development proposals that result in the loss of an existing community facility will only be allowed in special circumstances. The following facility has been identified as being especially important to the community:

- Earswick Village Hall



#### **4.4 Transport and Highways**

175. The objective of the following policy is to seek on-going improvements to transport facilities, roads and pathway conditions.

176. This will be achieved by improving accessibility for both pedestrians and cyclists to and from the Parish and by ensuring that traffic issues are a major consideration in any new residential development applications while continuing to seek improvements to its roads and pathways.

**177. The following plans, documents and strategies support this policy:**

- National Planning Policy Framework
- Draft City of York Local Plan
- Planning Policy Guidance
- City of York Local Transport Plan

#### **Justification and Evidence**

178. Consultation shows that transport is a top priority for local people.

179. The busy A1237 outer York ring road borders the community along its southern edge, with a turning off this highway that runs through the trunk of the Parish to the larger neighbouring village of Strensall. This is the major road between York and Strensall that also encompasses an army camp. Traffic flow increases during the summer months and at many weekends throughout the year, as coaches, lorries and other motor vehicles pass through the Parish to “short-cut” the extremely busy A64 York to Scarborough road. The main road through the Parish can become particularly congested during periods of peak travel.

180. Public transport provision in the Parish is barely adequate, with the only regular bus service travelling from Strensall to York city centre. During school terms, buses are also used to convey schoolchildren to and from the local High Schools. For most people living in the Parish, however, the car has become the principal mode of transport, even for some of the shortest journeys. Better footpaths, cycle paths and an underpass beneath the ring road connecting the Parish with the neighbouring parish of Huntington are needed and would help to address this issue.

181. Traffic management measures that improve highway and road pedestrian safety will be especially encouraged along roads where road safety issues have been identified locally, particularly from the northern approach to the village where the Ward and Parish Councillors are currently petitioning the relevant authorities to re-designate the speed limit from 60mph to 40mph. The suitability of the location of the existing bus stops will also be addressed.

182. The Ministry of Defence has recently announced plans to close the Strensall Army camp in 2020 with proposals to build around 550 homes on



the redundant site. Whilst the camp is located outside the application area of the Parish on, its northern boundary, the proposal would inevitably lead to a considerable increase in the volume of traffic passing through the village. The Parish Council, together with the Ward Councillors, will work closely with the City of York Council to identify measures to mitigate against any potential increased traffic flows along the Strensall Road through Earswick.

**POLICY ENP 11: ENHANCEMENTS TO TRANSPORT AND HIGHWAYS**

**- The Parish Council will actively seek to work with City of York Council and other bodies to encourage opportunities to achieve an enhancement in the transport and highway network by various actions, including the following:**

- a) Undertaking a review of all traffic issues in the Parish;**
- b) Ensuring that the means by which pedestrians and cyclists can cross the A1237 at Earswick, safely and securely, is considered as part of the reconfiguration of the roundabout;**
- c) Investigating ways to improve public transport;**
- d) Supporting the provision of a dedicated cycle lane through the Parish to Huntington, possibly as part of the ring road improvements;**
- e) Ensuring that any applications for development identify and consider the additional level of traffic that they are likely to generate and mitigate the impacts of this; and**
- f) Ensuring that any applications for development in the Parish consider how they will improve safe movement of pedestrians and cyclists to the services and community facilities within the Parish.**

183. The Parish has a good and well-used network of footpaths. Countryside footpaths around the open space lead to a flower meadow, scented garden, village pond, village green complete with maypole and two recently planted woodland areas. Walks along the River Foss, which flows along the western boundary of the Parish lead to the wider countryside.

184. Consultations show that these footpaths and bridleways are highly prized and cherished by residents, who wish to see them protected and wherever possible managed. Map 6 refers. (Note: at the present time there are no designated cycleways in the Parish).

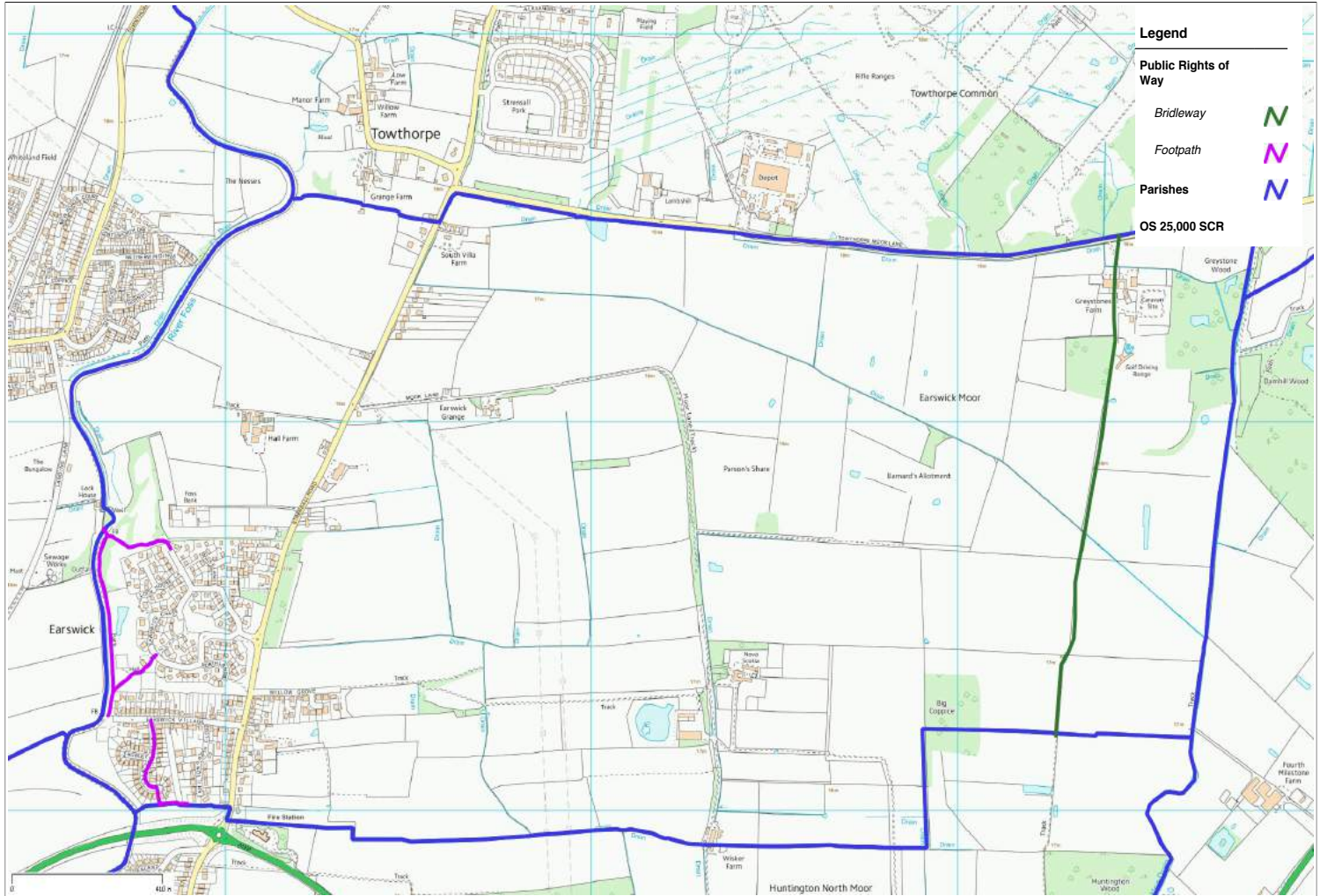
**POLICY ENP 12: PROTECTING FOOTPATHS/BRIDLEWAYS AND CYCLEWAYS: Development proposals should seek to incorporate improvements to the network of footpaths/cycleways or may be required to contribute to such improvements through a planning obligation, where the legal requirements are met.**

Map 6 – Public Rights of Way



Public Rights of Way

Earswick CP



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#### **4.5 Safety and Security**

185. The objective of this policy is to ensure that the Parish continues to be a safe and secure village in which to live.

186. This will be achieved by taking all reasonable measures to maintain the security of the Parish and its residents.

**187. The following plans, documents and strategies support this policy.**

- National Planning Policy Framework
- City of York Local Plan
- Planning Policy Guidance
- City of York Community Safety Plan

#### **Justification and Evidence**

188. Earswick is a very safe place in which to live. It enjoys a relatively low level of crime rate and the Parish already operates a very good Neighbourhood Watch Scheme that covers most areas of the Parish.

189. However, it remains a concern of local people. In the household survey residents placed Security and Crime as one of their top 3 key issues.

190. It is recognised that a neighbourhood plan cannot solve all the issues related to safety and security.

191. It can, however, help to highlight the importance of the local community in addressing it.

192. Furthermore, there is compelling evidence that the design of development proposals can make an important contribution to safety and security, for example through the incorporation of well-designed security features: the creation of spaces that are over looked and the creation of well-lit open spaces.

**POLICY ENP 13: SAFE AND SECURE PARISH - Safety and security should be a high priority in the design of developments proposals in order to create attractive and safe public and private places.**

## 5. Developer Contributions

193. Development can bring significant benefits to the local community, including new homes and jobs. It can also have negative impact, for example, where additional demand is placed on facilities and services that are already at or near capacity.

194. Planning obligations (known as Section 106 agreements) can be used to secure new community infrastructure, and, where necessary, address the impacts of development proposals. Contributions from Section 106 agreements can be pooled (but no more than five contributions) for the provision of one type of infrastructure. Occasionally, development will offer opportunities to enhance existing infrastructure. Where such improvements are made as part of new development proposals, this will be seen as a positive benefit.

195. A new system is also being introduced alongside the use of the existing Section 106 agreement. This is known as the Community Infrastructure Levy (CIL). CIL (like Section 106 agreements) is a tool available to City of York Council to fund and deliver infrastructure. This will require developers to make a payment to the City of York Council based on the size and type of development that is proposed. However CIL cannot be charged on a development proposal that is subject to a Section 106 agreement (to avoid double charging). The proceeds of CIL will then be used to provide the infrastructure necessary to support growth across the City. A proportion of these CIL receipts will automatically be devolved to the relevant Parish Council for allocation to neighbourhood priorities. This proportion is set at 25% in areas where there is a Neighbourhood Plan in force. At this time City of York Council is still considering whether to replace Section 106 agreements with CIL.

196. Through the preparation of the Plan, the Parish Council in conjunction with the community and other stakeholders has identified a small number of priority projects they wish to secure funding for (either in whole or in part) through the use of planning obligations.

**POLICY ENP 14: DEVELOPER CONTRIBUTIONS - The Parish Council will seek to prioritise the use of financial contributions, whether from Community Infrastructure Levy or negotiated obligations such as Section 106 agreements, for improvements to and enhancement of community facilities; local green spaces; improvements to traffic management; and enhancement of footpaths and cycle ways.**

## **6. Monitoring, Plan Delivery and Implementation**

197. The Neighbourhood Plan will be delivered and implemented over a long period and by different stakeholders and partners. It is not a rigid “blue-print” and provides instead a “direction for change” through its vision, objectives and policies. Flexibility will also be needed as new challenges and opportunities arise over the plan period. In this respect the review period will be crucial.

198. The Plan will be regularly monitored. This will be led by the Parish Council in conjunction with City of York Council, as the local planning authority, on at least an annual basis. The policies and measures contained in the Plan will form the core of the monitoring activity, but other data collected and reported at the Parish level relevant to the delivery of the Plan will also be included.

199. The Parish Council proposes to formally review the Plan on a five-year cycle or to coincide with the review of the City of York Local Plan if this cycle is different.

200. In terms of its delivery, there will be three strands of activity that will direct delivery and each is important in shaping the Parish in the months and years ahead. These comprise:

- The statutory planning process will direct and control private developer and investor interest in the Parish in the context of the Neighbourhood Plan and the wider Local Plan and National Planning Policy Framework.
- Investment in, and management of, public services, assets and other measures to support local services and the vitality and viability of the Parish. In the context of the prevailing economic climate and public funding there is a recognition that public investment in the village will be challenging to secure.
- The voluntary and community (third) sector will have a strong role to play particularly in terms of local community infrastructure, events and Parish life. It is hoped that this sector may play a stronger role in the future.

201. In terms of the key areas of action the following summarises the Parish Council’s approach to delivery and implementation.

### **Housing Growth:**

202. The Parish Council will work with developers and the Local Authority to deliver incremental growth over the Plan period, where this is applicable.

### **Local Character and Landscape:**

203. The Parish Council will work with residents, owners of land and buildings, and other stakeholders to bring back into economic use brownfield

sites, and vacant properties, especially those which make a positive contribution to the character of the area.

### **Local Facilities:**

204. The Parish Council will work with local organisations and the City of York Council to improve facilities and services for local people.

### **Transport:**

205. The Parish Council will work to find ways to improve road safety, and address speed and parking issues.

### **Safety and Security:**

206. The Parish Council will continue to invest in improved security measures to protect the public open space and the Parish assets.

**Appendix 1 National Planning Policy Framework – Section 9. Protecting the Green Belt: Paragraphs 89-92**

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- . buildings for agriculture and forestry
- . provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it
- . the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building
- . the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces
- . limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan
- . limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development

90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- mineral extraction
- engineering operations
- local transport infrastructure which can demonstrate a requirement for a Green Belt location
- the re-use of buildings provided that the buildings are of permanent and substantial construction
- development brought forward under a Community Right to Build Order

91. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

92. Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals

within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.



The 'Better Decision Making' tool should be completed when proposing new projects, services, policies or strategies.

This integrated impact assessment tool was designed to help you to consider the impact of your proposal on social, economic and environmental sustainability, and equalities and human rights. The tool draws upon the priorities set out in our Council Plan and will help us to provide inclusive and discrimination-free services. The purpose of this new tool is to ensure that the impacts of every proposal are carefully considered and balanced and that decisions are based on evidence.

**Part 1** of this form should be completed as soon as you have identified a potential area for change and when you are just beginning to develop a proposal. If you are following the All About Projects Framework it should be completed before going through Gateway 3.

**Part 2** of this form should be filled in once you have completed your proposal and prior to being submitted for consideration by the Executive. If you are following the All About Projects Framework it should be completed before going through Gateway 4. Your answer to questions 1.4 in the improvements section must be reported in any papers going to the Executive and the full 'Better Decision Making' tool should be attached as an annex.

Guidance to help you complete the assessment can be obtained by hovering over the relevant text or by following this link to the 'Better Decision Making' tool on Colin.

Guidance on completing this assessment is available by hovering over the text boxes.

**Please complete all fields** (and expand if necessary).

#### Introduction

<b>Service submitting the proposal:</b>	Strategic Planning
<b>Name of person completing the assessment:</b>	Anna Pawson
<b>Job title:</b>	Development Officer
<b>Directorate:</b>	Economy and Place
<b>Date Completed:</b>	30/01/2019
<b>Date Approved:</b> form to be checked by service manager	

#### Part 1

##### Section 1: What is the proposal?

1.1	<b>Name of the service, project, programme, policy or strategy being assessed?</b> Earswick Neighbourhood Plan - Examiner's Report
1.2	<b>What are the main aims of the proposal?</b> The Earswick Neighbourhood Plan aims for Earswick Parish to be a desirable place to live for all residents based on its distinctive, semi-natural character and open space, safe and secure environment and community spirit. The main purpose of the report is to request that Members agree the recommendations of the Examiner and allow the Earswick Neighbourhood Plan to proceed to referendum.
1.3	<b>What are the key outcomes?</b> To ensure that the Earswick Neighbourhood Plan can be progressed.

Section 2: Evidence

2.1	<p><b>What data / evidence is available to understand the likely impacts of the proposal?</b> (e.g. hate crime figures, obesity levels, recycling statistics)</p> <p>The Neighbourhood Plan uses the Local Plan evidence base to support its policies.</p>
2.2	<p><b>What public / stakeholder consultation has been used to support this proposal?</b></p> <p>Previous consultation responses received as part of two Pre-Submission Consultations (1st Consultation: 20th November 2016 to 7th January 2017 , 2nd Consultation: 4th December 2017 and 5th February 2018. ) and the Submission consultation (4th October to 15th November 2018) have shaped policy formation.</p>
2.3	<p><b>Are there any other initiatives that may produce a combined impact with this proposal?</b> (e.g. will the same individuals / communities of identity also be impacted by a different project or policy?)</p> <p>The Neighbourhood Plan has been developed alongside an emerging City of York Local Plan. The residents, businesses and people with a land interest in the Earswick area will also be consulted on as part of the Local Plan process.</p>

## Part 1

## Section 3: Impact on One Planet principles

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents.  
This section relates to the impact of your proposal on the One Planet principles.

For 'Impact', please select from the options in the drop-down menu.  
If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'.

## Equity and Local Economy

Does your proposal?	Impact	What are the impacts and how do you know?
3.1 <b>Impact positively on the business community in York?</b>	Neutral	There are no specific policies relating to York's business community. However it is recognised in the plan that there remain opportunities for windfall employment development over the lifetime of the Plan.
3.2 <b>Provide additional employment or training opportunities in the city?</b>	Neutral	There are no specific policies relating to additional employment or training opportunities in the city. However it is recognised in the plan that there remain opportunities for windfall employment development over the lifetime of the Plan.
3.3 <b>Help individuals from disadvantaged backgrounds or underrepresented groups to improve their skills?</b>	Neutral	There are no specific policies relating to individuals from disadvantaged backgrounds.

## Health &amp; Happiness

Does your proposal?	Impact	What are the impacts and how do you know?
3.4 <b>Improve the physical health or emotional wellbeing of staff or residents?</b>	Positive	The Neighbourhood Plan includes policies to protect local green spaces, to conserve and enhance ecology and biodiversity, to respect distinctive views, to protect footpaths/bridleways and cycleways. Safety and security is also a high priority in the parish.
3.5 <b>Help reduce health inequalities?</b>	Positive	The Neighbourhood Plan includes policies to protect local green spaces, to conserve and enhance ecology and biodiversity, to protect footpaths/bridleways and cycleways, enhancement to transport and highways. Safety and security is also a high priority in the parish.
3.6 <b>Encourage residents to be more responsible for their own health?</b>	Positive	The Neighbourhood Plan includes policies to protect local green spaces, to conserve and enhance ecology and biodiversity, to protect footpaths/bridleways and cycleways, enhancements to transport and highways. Safety and security is also a high priority in the parish.
3.7 <b>Reduce crime or fear of crime?</b>	Positive	The Neighbourhood Plan includes a Policy relating to a safe and secure Parish. It states that safety and security should be a high priority in the design of developments proposals in order to create attractive and safe public and private places.
3.8 <b>Help to give children and young people a good start in life?</b>	Positive	The Neighbourhood Plan includes a policy to protect local green space which has 30 acres of open space and includes its children's play area, junior football pitch and exercise equipment, tennis courts and a village hall where a number of community events take place.

## Culture &amp; Community

Does your proposal?	Impact	What are the impacts and how do you know?
3.9 <b>Help improve community cohesion?</b>	Positive	The production of a Neighbourhood Plan should help improve community cohesion by bringing people together with a shared goal of improving their neighbourhood.
3.10 <b>Improve access to services for residents, especially those most in need?</b>	Positive	The Neighbourhood Plan includes policies to protect the network of footpaths, Bridleways and cycleways and enhancements to transport and highways.
3.11 <b>Improve the cultural offerings of York?</b>	Positive	There is a policy relating to buildings and structures of local heritage interests which seeks to protect and preserve the historic character and features of Earswick.

3.12	<b>Encourage residents to be more socially responsible?</b>	Neutral	No specific reference.
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**Zero Carbon and Sustainable Water**

Does your proposal?	Impact	What are the impacts and how do you know?
3.13 <b>Minimise the amount of energy we use, or reduce the amount of energy we will use/pay for in the future?</b>	Positive	There is a climate change policy in the Neighbourhood Plan which indicates that developers will be encouraged to install efficient water and waste management systems in new buildings, use locally sourced wood fuel for heating, promote the use of sustainable materials in construction and encourage energy efficient measures for new builds.
3.14 <b>Minimise the amount of water we use or reduce the amount of water we will use/pay for in the future?</b>	Positive	There is a climate change policy in the Neighbourhood Plan which indicates that developers will be encouraged to install efficient water and waste management systems in new buildings.
3.15 <b>Provide opportunities to generate energy from renewable/low carbon technologies?</b>	Positive	There is a climate change policy in the Neighbourhood Plan which indicates that developers will be encouraged promote the use of sustainable materials in construction and encourage energy efficient measures for new builds.

**Zero Waste**

Does your proposal?	Impact	What are the impacts and how do you know?
3.16 <b>Reduce waste and the amount of money we pay to dispose of waste by maximising reuse and/or recycling of materials?</b>	Neutral	There is a climate change policy in the Neighbourhood Plan which indicates that developers will be encouraged to install efficient water and waste management systems in new buildings.

**Sustainable Transport**

Does your proposal?	Impact	What are the impacts and how do you know?
3.17 <b>Encourage the use of sustainable transport, such as walking, cycling, ultra low emission vehicles and public transport?</b>	Mixed	The Neighbourhood Plan includes policies to protect the network of footpaths, Bridleways and cycleways and enhancements to transport and highways.
3.18 <b>Help improve the quality of the air we breathe?</b>	Mixed	The Neighbourhood Plan includes policies to protect the network of footpaths, Bridleways and cycleways

**Sustainable Materials**

Does your proposal?	Impact	What are the impacts and how do you know?
3.19 <b>Minimise the environmental impact of the goods and services used?</b>	Positive	No specific reference

**Local and Sustainable Food**

Does your proposal?	Impact	What are the impacts and how do you know?
3.20 <b>Maximise opportunities to support local and sustainable food initiatives?</b>	Positive	No specific reference

**Land Use and Wildlife**

Does your proposal?	Impact	What are the impacts and how do you know?
3.21 <b>Maximise opportunities to conserve or enhance the natural environment?</b>	Positive	The Neighbourhood Plan includes policies to protect local green spaces, to conserve and enhance ecology and biodiversity and to respect distinctive views.

3.22	<b>Improve the quality of the built environment?</b>	Positive	There is a climate change policy in the Neighbourhood Plan which indicates that developers will be encouraged to install efficient water and waste management systems in new buildings, use locally sourced wood fuel for heating, promote the use of sustainable materials in construction and encourage energy efficient measures for new builds.
3.23	<b>Preserve the character and setting of the historic city of York?</b>	Positive	The Neighbourhood Plan includes a policy on the Green Belt and recognises the important role the Green Belt plays in determining the setting, character and identity of the village of Earswick and wider area.
3.24	<b>Enable residents to enjoy public spaces?</b>	Positive	The Neighbourhood Plan includes policies to protect local green spaces, to conserve and enhance ecology and biodiversity and to respect distinctive views.

3.25	<b>Additional space to comment on the impacts</b>		

**Part 1**

**Section 4: Impact on Equalities and Human Rights**

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents. This section relates to the impact of your proposal on **advancing equalities and human rights** and should build on the impacts you identified in the previous section.

For 'Impact', please select from the options in the drop-down menu.  
If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'

**Equalities**

Will the proposal **adversely impact** upon 'communities of identity'?  
Will it **help advance equality** or **foster good relations** between people in 'communities of identity'?

	Impact	What are the impacts and how do you know?	Relevant quality of life indicators
4.1 Age	Positive	None deemed likely	N/A
4.2 Disability	Neutral	None deemed likely	N/A
4.3 Gender	Neutral	None deemed likely	N/A
4.4 Gender Reassignment	Neutral	None deemed likely	N/A
4.5 Marriage and civil partnership	Neutral	None deemed likely	N/A
4.6 Pregnancy and maternity	Neutral	None deemed likely	N/A
4.7 Race	Neutral	None deemed likely	N/A
4.8 Religion or belief	Neutral	None deemed likely	N/A
4.9 Sexual orientation	Neutral	None deemed likely	N/A
4.10 Carer	Neutral	None deemed likely	N/A
4.11 Lowest income groups	Neutral	None deemed likely	N/A
4.12 Veterans, Armed forces community	Neutral	None deemed likely	N/A

**Human Rights**

Consider how a human rights approach is evident in the proposal

	neutral	What are the impacts and how do you know?
4.13 Right to education	neutral	None deemed likely
4.14 Right not to be subjected to torture, degrading treatment or punishment	neutral	None deemed likely
4.15 Right to a fair and public hearing	neutral	None deemed likely
4.16 Right to respect for private and family life, home and correspondence	neutral	None deemed likely

4.17	<b>Freedom of expression</b>	neutral	None deemed likely
4.18	<b>Right not to be subject to discrimination</b>	neutral	None deemed likely
4.19	<b>Other Rights</b>	neutral	None deemed likely

4.20	<b>Additional space to comment on the impacts</b>		

**Part 1**

**Section 5: Developing Understanding**

Based on the information you have just identified, please consider how the impacts of your proposal could be improved upon, in order to balance social, environmental, economic, and equalities concerns, and minimise any negative implications.

It is not expected that you will have all of the answers at this point, but the responses you give here should form the basis of further investigation and encourage you to make changes to your proposal. Such changes are to be reported in the final section.

<b>Taking into consideration your responses about all of the impacts of the project in its current form, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?</b>	
5.1	Given the wide range of policy areas covered by the Neighbourhood Plan and its over all vision which responds to the issues, opportunities and challenges facing the area it is considered that the plan will have a positive impact overall on creating a fair, healthy, sustainable and resilient neighbourhood.

<b>What could be changed to improve the impact of the proposal on the One Planet principles?</b> (please consider the questions you marked either mixed or negative, as well as any additional positive impacts that may be achievable)	
5.2	No improvements considered necessary.

<b>What could be changed to improve the impact of the proposal on equalities and human rights?</b> (please consider the questions you marked either mixed or negative, as well as any additional positive impacts that may be achievable)	
5.3	No mixed or negative impacts on equality and human rights are considered likely.

**Section 6: Planning for Improvement**

<b>What further evidence or consultation is needed to fully understand its impact?</b> (e.g. consultation with specific communities of identity, additional data)	
6.1	The community has been widely consulted on the content of the Plan. Members are being asked to agree the Examiner's recommendations which include progressing the Plan to referendum. Therefore, the community will have the final say when they vote in the referendum whether or not to agree with the final Plan.

6.2	<b>What are the outstanding actions needed to maximise benefits or minimise negative impacts in relation to this proposal?</b> Please include the action, the person(s) responsible and the date it will be completed (expand / insert more rows)
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Action

Person(s)	Due date





6.3	<b>Additional space to comment on the impacts</b>

**Part 2**

**Section 1: Improvements**

Part 2 builds on the impacts you identified in Part 1. Please detail how you have used this information to make improvements to your final proposal.

**Please note that your response to question 1.4 in this section must be reported in the One Planet Council implications section of reports going to the Executive.**

	<b>For the areas in the 'One Planet' and 'Equalities' sections, where you were unsure of the potential impact, what have you done to clarify your understanding?</b>
1.1	Given the wide ranging policy areas covered in the plan and the process taken so far in preparing the plan there are inherent links and good understanding of the one planet principles and equalities.

	<b>What changes have you made to your proposal to increase positive impacts?</b>
1.2	No changes considered necessary.

	<b>What changes have you made to your proposal to reduce negative impacts?</b>
1.3	No negative impacts anticipated.

	<b>Taking into consideration everything you know about the proposal <u>in its revised form</u>, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?</b>
	Your response to this question must be input under the One Planet Council implications section of the Executive report. Please feel free to supplement this with any additional information gathered in the tool.
1.4	Given the wide range of policy areas covered by the Neighbourhood Plan and its over all vision which responds to the issues, opportunities and challenges facing the neighbourhood it is considered that the plan will have a positive impact overall on creating a fair, healthy, sustainable and resilient neighbourhood.

1.5	<b>Any further comments?</b>

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**Local Plan Working Group****27 February 2019**

Report of the Corporate Director for Economy and Place  
(The Local Plan is the portfolio of the Leader and the Executive Member for Economic Development and Community Engagement)

**York Local Plan Update****Summary**

1. The purpose of this report is to update Members on the Local Plan examination including additional technical evidence regarding the Objective Assessment of Housing Need (OAN) which was submitted to the Planning Inspectorate (PINS) on 29<sup>th</sup> January 2019 following approval by the Corporate Director of Economy and Place in consultation with relevant Members in accordance with the delegated authority from Council.
2. The report also updates Members on further work undertaken in relation to the Habitat Regulation Assessment (HRA) and the implications for the submitted Plan. The Local Plan Working Group will be asked to recommend to Executive any consequential decisions required to be made due to the HRA work, where the specific decisions are considered to be outside the scope of the existing delegation already provided to the Corporate Director of Economy and Place in consultation with the relevant Members.

**Recommendations**

3. Members are asked to recommend that Executive:
  - i) Note the additional OAN evidence already submitted to PINS following approval by the Corporate Director of Economy and Place in consultation with the relevant Members under delegated powers.

Reason: To allow Officers to progress York's Local Plan through to hearing sessions to determine the OAN.

- ii) Approve the modification schedule attached at Annex G to the report for submission to PINS for examination.

Reason: So that York's Local Plan can progress through examination.

## **Background**

4. As Members are aware the Local Plan was submitted for examination on 25<sup>th</sup> May 2018. The Council has been appointed two Inspectors, Simon Berkeley and Andrew McCormack to undertake the examination. The Inspectors wrote to the Council on 24<sup>th</sup> July 2018 setting out their initial observations in relation to the Plan. Key issues raised were in relation to OAN, green belt and infrastructure delivery. Officers reported an update on the response to LPWG on 20<sup>th</sup> September 2018 following the release of revised sub-national household projections by Office for National Statistics (ONS).
5. The Council responded to the Inspectors in detail on 13<sup>th</sup> November 2018 and advised that since the publication of new national evidence on population and household projections in September which showed a marked downward trend in forecast growth for York we had been in dialogue with the Ministry of Housing, Communities and Local Government (MHCLG) regarding the assessment of housing need. Specifically the letter set out the intention of the Council to commission an update to the OAN to look at any potential implications of the new evidence with the suggestion to Inspectors that they should consider allowing early hearings on this matter specifically. The letter also confirmed the Council's approach to greenbelt and the delineation of greenbelt boundaries and confirmed that we would produce an addendum to Topic Paper 1 (Approach to York's Greenbelt) providing the additional clarification that the Inspectors have requested.
6. The Inspectors wrote back to the Council on 14<sup>th</sup> December confirming that the York Local Plan would be examined under transitional arrangements applying the 2012 NPPF, acknowledging the provision of additional evidence and agreeing to a phased approach to hearing sessions, with the first phase dealing with Duty to Co-operate, legal matters, OAN and Greenbelt principle.

## Objective Assessment of Housing Need (OAN)

7. The Council has now received the OAN Update from consultants GL Hearn (Annex A) which was issued to PINS on 29<sup>th</sup> January 2019 and published on the York Local Plan examination webpage ([www.york.gov.uk/localplanexamination](http://www.york.gov.uk/localplanexamination)) along with a covering letter updating on other related matters including the HRA and greenbelt (Annex B). This evidence was approved for submission to the Examination by the Corporate Director of Economy and Place in consultation with relevant Members, in accordance with the delegated authority from Council.
8. The OAN Update report concludes that overall the 2016 based subnational population projections (SNPP) for York show an average annual population growth over the period 2012 to 2037 of 24,036, significantly lower than the previous (2014 based) figure of 36,348 for the same period upon which the submitted Local Plan was based. GL Hearn's analysis of the components of population change suggest that the 2016 based population projections provide a more robust assessment of population growth for York than their predecessor which is also ratified by more recent population estimates in the Mid Year Estimates (2017, ONS). The main reason for this change relates to updated forecasts of international migration along with a downward trend in fertility rates and revised assumptions for increases in life expectancy.
9. These population figures are then translated into household growth and a dwelling requirement using a range of assumptions on household representative rates and also including a vacancy rate of 3%. The household formation rates analysis undertaken identifies a potential constraint within the official projections particularly for those aged 25-34 yrs. GL Hearn have therefore developed an alternative household representation rate scenario whereby the rates for this age group, and those aged 35 to 44 yrs are part returned to the household formation rates seen in the 2008 based (pre-recession) projections. These calculations result in an adjusted dwelling requirement of 679 per annum (an increase on the demographic starting point (DSP) of 484 dwellings per annum).
10. In accordance with National Planning Practice Guidance (NPPG) applied under transitional arrangements GL Hearn have then considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability (market signals). They have calculated the housing need required to meet an economic

growth of 650 jobs per annum (based on the Local Plan target underpinned by the Employment Land Review Update, 2017). Using a series of assumptions including economic activity rates from the Office of Budget Responsibility (OBR) results in an economic led need for housing of up to 790 dwellings per annum.

11. GL Hearn have also provided an updated analysis of housing market signals which show that house prices are relatively high in York and that housing affordability is a significantly worsening issue over the last five years. Affordable Housing needs remains at 573 dpa. In accordance with NPPG an uplift to improve affordability is required and considering the evidence GL Hearn proposes a 15% uplift. When applied to the demographic starting point (484 dpa) this 15% uplift would result in an OAN of 557 dpa which is some way short of the economic led need of 790 dpa.
12. The report therefore concludes that the OAN in York is 790 dpa which would be sufficient to respond to market signals, including affordability adjustments as well as making a significant contribution to affordable housing needs. Only by providing this level of housing growth would the population be sufficient to meet the economic growth potential whilst ensuring that there will be improvements to household representative rates among younger persons.
13. The updated OAN of 790 confirms to the Council that the robustness of submitted plans housing supply, based on the OAN of 867 dwellings per annum, is strengthened further by the reduction in the OAN. Officers consider that the submitted plans proposed housing supply can be robustly demonstrated to meet the revised OAN of 790 dwellings per annum both for the plan period (to 2033) and post plan period ( to 2038). The proposed housing supply in the submitted Plan will provide the required flexibility in order to be able to demonstrate to the Inspector that the Plan can respond to unforeseen circumstances over the duration of the plan period. In addition the submitted Plan proposes to create a green belt boundary for York which will endure beyond the end of the plan period to meet longer term development needs, a requirement of the National Planning Policy Framework (NPPF, 2012) against which the Plan will be examined, applying transitional arrangements.
14. The new revised evidence updates the previous OAN evidence submitted with the plan – the 2017 Strategic Housing Market Assessment (SHMA) Update. This evidence was approved for submission to the Examination by the Corporate Director of Economy



and Place in consultation with relevant Members, in accordance with the delegated authority from Council.

### **Habitat Regulations Assessment (HRA) - Strensall Common Special Area of Conservation (SAC)**

15. Habitat Regulation Assessment (HRA) is a requirement of the Conservation of Habitats and Species and Planning (various amendments) (England and Wales) Regulations 2018 (“HRA Regs”). This requires that an assessment of the impacts of the Local Plan on sites designated under the EU Directive (92/431/EEC Habitats Directive) must be undertaken. The purpose of the Habitat Regulations Assessment (HRA) is to identify any aspects of the Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects are identified.
16. There is a legal requirement for all Local Plans to be subject to a HRA. The need for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2018. For York, this requires assessment of ‘likely significant effects’ on Strensall Common Special Area of Conservation (SAC), River Derwent SAC and the Lower Derwent Valley Special Protection Area (SPA/ RAMSAR) as well as 4 sites within 20km of the authority boundary.
17. The purpose of the Habitats Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA).
18. The Habitats Directive applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. The process for assessing the potential effects on European protected sites included a screening stage, where an assessment of whether likely significant effects exist. Following that, an appropriate assessment (AA)

is undertaken to establish whether adverse effects on the integrity of protected sites would occur

19. The screening exercise undertaken as part of the submitted HRA concluded that significant effects from recreational pressure on the dry and wet heathland communities at Strensall Common Special Area of Conservation (SAC) could not be ruled out alone, therefore an appropriate assessment was undertaken to establish whether adverse effects on the integrity of protected sites would occur. The AA concluded that if the proposed modifications to the Publication Draft Local Plan were adopted that *'the Council can ascertain that Policies SS19/ST35 (Queen Elizabeth Barracks, Strensall), E18 (Towthorpe Lines) and H59 (Land at Howard Road, Strensall) will have no adverse effect on the integrity of Strensall Common European site in terms of recreational pressure and that there would be no residual effects and no need for an in combination assessment'*. The conclusion was based on the adoption of a suite of modifications to policy SS19 (Queen Elizabeth Barracks, Strensall) including but not limited to, the erection of a barrier between the allocation and the Common, the management of open space within the policy area and the development of a funded wardening service to influence public behaviour on the SAC of existing and future residents. Drawing on the experiences of other proposals elsewhere in the country it was believed that these mitigation measures would provide sufficient confidence to allow effects on the integrity of the site to be ruled out.
20. Following submission of the Local Plan in May 2018, with the proposed modifications outlined in paragraph 19 above [CD003], the Council received correspondence from Natural England regarding the HRA. Natural England stated in their letter dated 4<sup>th</sup> June 2018 (EX/CYC/1) that in reference to the threat posed by recreational pressure that they *'did not agree that adverse effects on integrity can be ruled out based on the evidence available'* and went on to recommend that *'robust and comprehensive visitor assessment will be necessary to determine whether the mitigation outlined in policy SS19 are adequate to offset the impact of the proposal and the wider impact of the plan and allocation H59 in particular'*.
21. Accordingly the Council commissioned Footprint Ecology to undertake this assessment and advised Natural England that we would seek to agree the visitor survey methodology to ensure it meets expectations.
22. The Visitor survey was commissioned in June 2018 using and the methodology was discussed and agreed with Natural England in July

2018. Surveys were undertaken in August and September 2018 at the Lower Derwent Valley SPA, Skipwith Common SAC and Strensall Common SAC. Final reports were issued in December 2018 and February 2019 respectively.

23. The full report from Footprint Ecology for Strensall Common SAC is provided at Appendix D to Annex C this report. Key findings included the following:

- 73% of interviewed visitors brought their dogs – of the 190 dogs observed 45% of them were off-lead during the interview;
- 43% of dog walkers visited daily;
- 78% of all interviewees visited regularly throughout the year;
- The median distance travelled to the site, as the crow flies, was 2.4km and 75% of visitors came from within a radius of 5.5km, the median length travelled whilst on the Common was 2.5km;
- Overall visits were expected to increase by 24%, reflecting a 61% increase in housing within 500m of the SAC;
- Recreational impacts, typically comprising trampling, fires, eutrophication from dog fouling etc was evident although these were mainly limited in extent and severity and generally found in close proximity to car parks;
- The report also identified that the worrying of livestock by dogs is already resulting in a loss of animals and may jeopardise future grazing – future grazing will be a vital tool in restoring the SAC to favourable condition; and
- The report concluded (in the absence of mitigation) that given the scale of the increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to the current impacts from recreation, adverse impacts on the integrity of the SAC cannot be ruled out as a result of the quantum of development proposed. In addition for the individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity.

24. The report then considers potential mitigation measures but in the main these comprise a range of measures similar to those already proposed in the existing modified policy SS19. Drawing on the outcomes of the evidence it is imperative that the mitigation measures can be shown robustly to not only address the causes of the evidence of harm occurring on the site but especially to reduce the worrying of livestock.

The report casts doubt particularly in relation to the effectiveness of the open space proposed within site ST35 (Queen Elizabeth Barracks).

25. The submitted Plan includes a 7ha allocation of open space (OS12) as part of the ST35 site adjacent to the site and the Common. It is doubted whether this amount of space would be sufficient to enable the provision of a circular route of 2.5km (that represented the median distance walked by visitors to the common). It is estimated that in order to create a circular route of this length it would require an area of land of circa 30ha. It is also considered that the creation of new open space adjacent to the Common would lack the natural setting which is highlighted by many visitors as one of the main reasons to visit the SAC currently. This new evidence suggests that the proposed new open space would prove less attractive than previously anticipated and that new residents would still seek access to the Common with their dogs.
26. The report recognises that a permanent barrier (as currently proposed in policy SS19) could restrict direct access to the common but it refers to evidence from a similar case at Talbot Heath in Dorset where the Secretary of State questioned the effectiveness of a barrier to reduce access to the adjacent SAC/SPA because its permanence could not be guaranteed and refused the application. The report acknowledges that the MODs current presence gives greater confidence that a barrier could be maintained but questions whether this can be guaranteed, particularly in the longer term. The report also states that around the Thames Basin Heath European site (SPA) all residential development is precluded within 400m of the heathland to reduce the magnitude of the threat applying the pre-cautionary principle. Whilst the Thames Basin Heath is a SPA, designated for the protection of birds, rather than a SAC it is considered that the proximity issue is a relevant consideration in relation to the distance of the proposed allocations (ST35 and H59) to the Strensall Common SAC.
27. Evidence from around the country shows that all the proposed mitigation measures already suggested in Policy SS19 of the submitted Local Plan and those considered in the Footprint Ecology report could potentially contribute to a reduction in harmful impacts from increased recreational pressure. However, the Habitat Regulations Assessment Handbook states that for mitigation measures to be taken into account they should be effective, reliable, timely, guaranteed to be delivered and as long term as they need to be. The Visitor Survey report provided by Footprint provides objective evidence that concludes that the effectiveness of the measures proposed are likely to be of varying success and that the long

term implementation of such measures would be challenging. The report concludes that *'At Plan level HRA it will be necessary to have confidence that the above mitigation measures are feasible and achievable in order to rule out adverse effects on integrity on Strensall Common SAC as a result of increases in recreation there needs to be confidence that the measures will be successful'*.

28. It is considered that the Visitor Survey report provides new, strong evidence (or objective information) that the proposed mitigation cannot be completely relied upon. Therefore the Council, as the competent authority, would not be able to conclude that site allocations ST35 and H59 and the associated site specific policy SS19 would not undermine the conservation objectives for the SAC (which require the maintenance or restoration of the extent and distribution of the heathland features). This new evidence also contradicts the expectation of the submitted HRA that the additional requirement for a wardening service would remove the threat of an adverse effect on the integrity of the SAC; the increase in visitor numbers of 24% is particularly compelling. Fundamentally this scale of increase, the uncertainty surrounding the effectiveness of mitigation and the associated increase in the worrying of livestock ensures that adverse effects on integrity (AEOI) cannot be ruled out.
29. To avoid an AEOI it is recommended by the HRA that the ST35 and H59 allocations are both removed from the Plan. The updated HRA report is attached as Annex C to this report. H59 is proposed to be removed alongside ST35 because there is no meaningful way to mitigate the effects of recreation arising from the general site allocation either on site or in-combination with the larger site allocation ST35. It is considered that it would also be difficult to limit access to the common from the site given the location of the allocation in close proximity to Scott Moncrieff Car Park. Removal of both sites is therefore proposed in the schedule of modifications (Annex E).
30. The effect of removing both allocations (ST35 and H59) reduces the residual increase in recreational pressure from the remaining Local Plan allocations to 6%. It should also be noted that in arriving at this figure the report did not consider the open space associated with these other strategic allocations which could reasonably be expected to reduce the number of at least some of these visits. Therefore it is concluded that there is no need for additional mitigation for these allocations.

31. The previous HRA ruled out AEOI from site E18 (Towthorpe Lines) a 4ha employment allocation adjacent to the southern boundary of the SAC on account of its employment function and the lack of threat posed by employees. It is considered that workers and business visitors and the anticipated absence of dogs will pose little threat to the SAC. Outside business hours it is possible that if left unsecured the site could be used as a car park for visitors to the Common. However, it is considered that this potential threat can be removed by relatively simple measures that preclude the use of the site outside business hours and to be a secure site. Annex E to this report provides a proposed modifications schedule which includes suggested amendments to policy EC1 (Employment allocations) and GI2 (Biodiversity) to strengthen the submitted Plan in relation to the E18 allocation.

### **Habitat Regulations Assessment (HRA) – Lower Derwent Valley Special Protection Area (SPA) and Skipwith Common Special Area of Conservation (SAC)**

32. The Visitor Survey for the Lower Derwent Valley (LDV) and Skipwith Common SAC was commissioned in conjunction with Selby District Council (see Appendix C to Annex C of this report). Key findings included:
- Virtually all (92%) of interviews were with those who had undertaken a day trip/short visit directly from home that day;
  - The most frequently recorded activity across all survey points was dog walking (32% of interviewees). Walking (30% interviewees) and bird or wildlife watching (20%) were also frequently recorded activities;
  - There were markedly different activities recorded at the different survey points. Dog walking was mostly at Skipwith Common, rather than the LDV and no dog walkers were interviewed at all at Bank Island (Wheldrake), where walkers (44% of interviewees there) predominated;
  - Dog walkers were the group who visited the most frequently, with 19% visiting daily or most days;
  - Overall, most (90%) of interviewees had travelled by car, with only small numbers arriving on foot (4%), by bicycle (4%) or by bus (1%). Cars were the main mode of transport at all survey points;
  - Overall the scenery/variety of views was the most common given reason for the choice of site to visit that day, cited by 42% of interviewees (across both the LDV and Skipwith survey points);

- Close to home featured much more strongly as a reason for site choice at Skipwith Common, where it was cited as frequently as the scenery/variety of views;
  - Across all survey points and all interviewees, the median distance from home postcode to interview locations was 11.7km and 75% of interviewees had come from within 15.5km;
  - The median distance from home postcode to interview location at Skipwith Common was 8.8km, compared to 11.2 at Wheldrake Ings and 13.2 at Bank Island; and
  - At Bank Island and Wheldrake Ings the data show people moving along the river between the two survey points and at Wheldrake Ings the route to the hides is the key focus, with some visitors following the river bank and others walking directly across the field.
33. Overall the results show that the two sites are used for a variety of recreational activities, but the data suggests relatively low levels of use. There were some differences between the LDV and Skipwith Common. The LDV appears to draw people from a wider area predominantly for walking and for the wildlife. The site is promoted as a nature reserve and many interviewees were coming for that reason. Marked trails and hides provide the main routes, and are designed to minimise impacts.
34. The report considers that the closest points of open access on to the LDV from York are well managed and likely to attract people specifically interested in wildlife. It also suggests that of the two sites, Skipwith Common is the more vulnerable due to the particular issues relating to dogs off leads and grazing.
35. In conclusion the Visitor Report considers that there are likely significant effects from development on both LDV and Skipwith Common. However, at the plan level HRA, it is considered that the results presented should be sufficient to rule out adverse effects on the integrity for both sites with respect to recreation for any single development alone, unless they are large-scale and within 1km. The submitted Local Plan does not include proposed allocations within 1km of either LDV or Skipwith Common SAC. The report also states that the results should be able to rule out adverse effects on the integrity of the sites in relation to recreational pressure for the quantum of development as a whole (i.e. in-combination) but considers that monitoring and review should be included within the plan to understand whether future avoidance or mitigation measures will be required. Annex E to this report includes a proposed modifications schedule which suggests an additional monitoring and review mechanism to ensure the outcomes of the report

can be reflected in order to understand whether future avoidance or mitigation measures will be required.

36. Overall, the outcomes of the Visitor Survey concurs with our HRA Appropriate Assessment (2018) the outcomes of which are reiterated in the revised HRA report (Annex C). This provides confidence in the existing mitigation proposed in the Local Plan and as part of the schedule of modifications submitted in May 2018 (CD003).

### **Natural England (NE)**

37. City of York Council (as the 'Competent authority') at the Appropriate Assessment stage must consult Natural England and have due regard to any representations they make.
38. Officers met with Natural England on 4<sup>th</sup> February 2019 to discuss the potential implications of the Visitor Survey evidence on the submitted Local Plan. Natural England has since confirmed their initial thoughts on these surveys and the letter is appended as Annex D to this report.
39. For the Lower Derwent Valley (LDV) and Skipwith Common SAC NE concur with the results of the survey which suggests that additional visitor pressure resulting from housing allocations within the Plan are unlikely to result in an adverse effect on integrity. They do also highlight anecdotal information about recreation pressure occurring from adjacent village communities and comment that the survey did not assess visitor pressure from adjacent villages such as East Cottingwith, Ellerton and Thorganby which lie outside of the CYC boundary and may have therefore under recorded recreational pressures.
40. For Strensall Common SAC NE conclude that they concur with the conclusions of the Visitor Survey that *'given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity'*. It also states, in relation to potential approaches to mitigation that *'Natural England does not believe it is possible to rule out an adverse effect on the integrity of the Strensall Common SAC as a result of allocations currently included in the draft York Local Plan'*.



## **Ministry of Defence (MOD)**

41. Officers met with the MOD and their agents Avison Young on 12<sup>th</sup> February to discuss the above implications for the site allocations at Queen Elizabeth Barracks following an earlier meeting in November when the draft findings of the Visitor Survey were shared. The MOD is currently reviewing its position in relation to the site.

## **Modifications to the submitted Local Plan**

42. Annex E to this report sets out officers proposed modifications to the submitted Local Plan as a result of the Visitor Survey and updated HRA. These modifications propose the removal of housing sites ST35 and H59 resulting in the deletion of 545 dwellings from the submitted plans housing supply. Officers consider that the submitted plans proposed housing supply can be robustly demonstrated to meet the revised OAN of 790 dwellings per annum both for the plan period (to 2033) and post plan period ( to 2038). The proposed housing supply in the submitted Plan provides the required flexibility in order to be able to demonstrate to the Inspector that it can respond to unforeseen circumstances over the duration of the plan. In addition the submitted Plan proposes to create a green belt boundary for York which will endure beyond the end of the plan period to meet longer term development needs, a requirement of the National Planning Policy Framework (NPPF, 2012) against which the Plan will be examined, applying transitional arrangements.

## **Next steps**

43. Officers have received an indication from the Planning Inspectorate (PINS) that now they have received the revised OAN and with the potential for implications arising from the HRA that further targeted consultation may be required prior to hearings to ensure that interested parties can make their views known prior to holding hearing sessions. It is anticipated that this consultation would be required to be directed to those parties who made a representation at the Regulation 19 stage (Publication consultation, Feb-April 2018) for a six week period.
44. Officers are requesting that this consultation takes place after the purdah period ahead of York's local elections which starts on the 26<sup>th</sup> March 2019 and this will therefore effect the timetabling of hearing sessions. It is important to continue to demonstrate progression to PINS particularly having regard to the threat of intervention and therefore it is imperative

that issues in relation to the HRA and Strensall Common SAC are dealt with swiftly.

### **Consultation**

45. As detailed in paragraph 43 above further targeted consultation may be required on the additional OAN evidence already submitted to PINS and proposed modifications to the submitted Plan as a result of the updated HRA. This consultation would be for a six week period and would be specifically with those parties who have made a representation at Regulation 19 stage.
46. When examination hearings commence on issues set out in the Local Plan, a statutory 6 weeks notice period will be given to allow interested parties to attend the meeting. Those able to take part will have registered their interest through the Regulation 19 consultation held between 21<sup>st</sup> February and 4<sup>th</sup> April 2018. Our appointed Programme Officer will ensure participation by registered parties is appropriate for the session.
47. Any further modifications made to the plan to make it legally compliant or sound in line with national policy during the examination process, will be consulted on prior to adoption of the plan. This will be a citywide consultation seeking comments on the changes prior to Members consideration at committee.

### **Implications**

48. In terms of procedural compliance it is the HRA that carries the highest potential residual risk. HRA's are a requirement of the Conservation of Habitats and Species and Planning (various amendments) (England and Wales) Regulations 2018 ("HRA Regs") and must assess the impacts of the Local Plan on sites designated under the EU Directive (92/431/EEC Habitats Directive).
49. The HRA has been an iterative process throughout Plan production and concluded at Submission stage that, with mitigation, adverse effects on the integrity on SACs, SPA's and RAMSARs could be ruled out. The new evidence produced highlights that the increase in development at Strensall common is likely to be lead to adverse impacts on the integrity of the site. In order to satisfy the HRA Regulations, the Council will need to need to make a modification to the plan to remove site allocations ST35 and H59.

## Risk

50. Legal – The procedures which the Council is required to follow when producing a Local Plan derive from the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012.
51. The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework as being:
  - **Positively Prepared:** based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
  - **Justified:** the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective:** deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with national policy:** enable the delivery of sustainable development in accordance with the policies in the Framework.
52. In order for the draft Local Plan to pass the tests of soundness, in particular the ‘justified’ and ‘effective’ tests, it is necessary for it to be based on an adequate, up to date and relevant evidence base. The Council also has a legal duty to comply with the Statement of Community Involvement in preparing the Plan. (S19(3) 2004 Act).
53. In addition the Council also has a legal “Duty to Co-operate” in preparing the Plan. (S33A 2004 Act).
54. Financial – **Financial (1)** – The work on the Local Plan is funded from specific budgets set aside for that purpose. Over the last four years, significant sums have been expended on achieving a robust evidence base, carrying out consultations, sustainability and other appraisals, policy development and financial analyses. Whilst this work remains of great value it is important that progress is made to ensure that unnecessary additional costs do not occur.
55. **Financial (2)** - It should also be considered that if the approach taken is subsequently judged to be non compliant with Government Guidance either before or after submission this could lead to further technical work and additional consultation adding to the identified costs and creating delay.

56. **Financial (3)** - Managing the planning process in the absence of a Plan will lead to significant costs to the council in managing appeals and examinations.

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**Report Approved**



**Date** 18/02/2019

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Legal Implication: Alison Hartley, Legal Services Manager (Corporate Governance)

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**Wards Affected:**

All

**For further information please contact the author of the report**

**Back ground Papers:**

Letter from natural England - 4<sup>th</sup> June 2018:

[https://www.york.gov.uk/downloads/file/16322/letter\\_from\\_natural\\_england\\_-\\_04\\_june\\_2018](https://www.york.gov.uk/downloads/file/16322/letter_from_natural_england_-_04_june_2018)

Council response to Natural England – 19<sup>th</sup> June 2018:

[https://www.york.gov.uk/downloads/file/16323/response\\_to\\_natural\\_england\\_from\\_cyc\\_-\\_19\\_june\\_2018](https://www.york.gov.uk/downloads/file/16323/response_to_natural_england_from_cyc_-_19_june_2018)

Letter from Inspectors to City of York Council setting out their initial observations on the submitted York Local Plan, 24<sup>th</sup> July 2018 (EX/INS/1)

[https://www.york.gov.uk/downloads/file/16579/exins1 -  
\\_initial observations 24 july 2018](https://www.york.gov.uk/downloads/file/16579/exins1_-_initial_observations_24_july_2018)

Response from City of York Council to Inspectors on their initial observations, 13<sup>th</sup> November 2018 (EX/CYC/7)

[https://www.york.gov.uk/downloads/file/17066/excyc7 -  
\\_city of york letter of response to inspectors 13 november 20  
18](https://www.york.gov.uk/downloads/file/17066/excyc7_-_city_of_york_letter_of_response_to_inspectors_13_november_2018)

Letter of response from Inspectors to City of York Council, 14<sup>th</sup> December 2018 (EX/INS/2)

[https://www.york.gov.uk/downloads/file/17204/exins2\\_inspectors\\_i  
nitial observations 14 dec 2018](https://www.york.gov.uk/downloads/file/17204/exins2_inspectors_i_nitial_observations_14_dec_2018)

Letter to Inspectors from City of York Council outlining progress on the submission of additional evidence as requested by the Inspectors and enclosing Housing Needs Update (GL Hearn), 29<sup>th</sup> January 2019 (EX/CYC/8)

[https://www.york.gov.uk/downloads/file/17379/excyc8 -  
\\_response to pins 290119](https://www.york.gov.uk/downloads/file/17379/excyc8_-_response_to_pins_290119)

CD003 – Modifications schedule submitted with York Local Plan (May 2018)

[https://www.york.gov.uk/downloads/file/15871/cd003 -  
\\_city of york local plan publication draft schedule of minor m  
odifications to 25th may 2018 pdf](https://www.york.gov.uk/downloads/file/15871/cd003_-_city_of_york_local_plan_publication_draft_schedule_of_minor_m odifications_to_25th_may_2018_pdf)

**Annexes:**

Annex A: Housing Needs Update (GL Hearn, 2019)

Annex B: City of York Council letter to PINS, January 2019

Annex C: Updated Habitat Regulations Assessment (2019)

Annex D: Letter from Natural England (February 2019)

Annex E: Proposed Modifications Schedule

**List of abbreviations used in this report:**

OAN – Objectively Assessed Housing Need

PINS – Planning Inspectorate

HRA – Habitat Regulations Assessment

ONS – Office for National Statistics

MHCLG – Ministry for Housing, Communities and Local Government

NPPF – National Planning Policy Framework  
SNPP – Sub-national Population Projections  
SNHP – Sub-national Household Projections  
DSP – Demographic Starting Point  
NPPG – National Planning Practice Guidance  
OBR – Office of Budget Responsibility  
SHMA – Strategic Housing Market Assessment  
SAC – Special Area of Conservation  
EU – European Union  
SPA – Special Protection Area  
RAMSAR – Internationally important wetlands  
AA – Appropriate Assessment  
NE – Natural England  
MOD – Ministry of Defence  
AEOI – Adverse effect on integrity  
LDV – Lower Derwent Valley

# City of York – Housing Needs Update

**City of York Council**

January 2019

**Prepared by**

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Public

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**Quality Standards Control**

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

DATE  
January 2019

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**Limitations**

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

## 1 INTRODUCTION

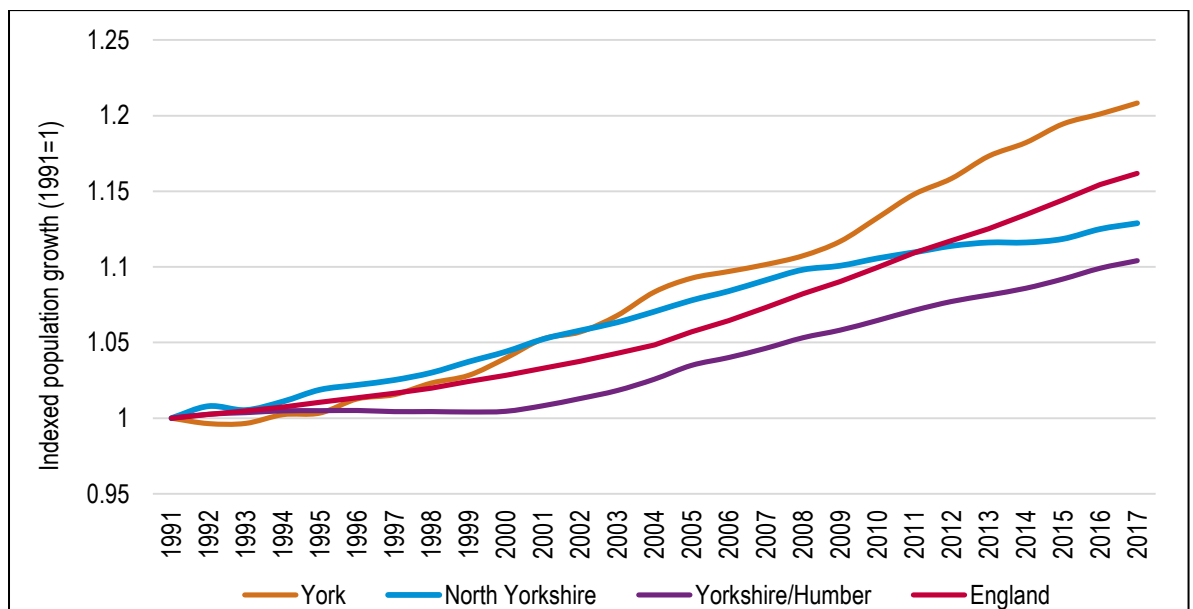
- 1.1 The latest set of (2016-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in May 2018. Drawing from these, in September 2018, ONS published the 2016-based Sub-National Household Projections (SNHP). In between these publications the most up to date demographic evidence was published by way of the 2017 Mid-Year Population Estimates (MYE).
- 1.2 This report seeks to interrogate the 2016-based SNPP, 2016-based Household Projections and the latest mid-year estimates (2017) to consider the potential implications for household growth and housing needs in York.
- 1.3 The SNPP provides an estimate of the future population of local authorities, it assumes continuation of recent local trends when disaggregating from the national level. This includes examining and adjusting for trends in fertility, mortality and internal migration; assumptions on international migration at a national level are based on trends over the past 25-years (period to mid-2016) but then assigned to local areas on the basis of data over the previous six years. The SNPP are constrained to the assumptions made for the 2016-based National Population Projections so that totalling up all local authority data will tally with national estimates.
- 1.4 The SNPP and SNHP are not forecasts and do not attempt to predict the impact that future government or local policies, changing economic circumstances or other factors might have on demographic behaviour. The primary purpose of the SNPP is to provide an estimate of the future size and age structure of the population of local authorities in England.
- 1.5 The SNPP are also used as a common framework for informing local-level policy and planning in a number of different fields as they are produced in a consistent way.
- 1.6 The analysis herein looks at housing need over the period from 2012-37 to be consistent with the Local Plan. Because the projections are 2016-based and there is a known population for 2017 this essentially means that data for 2012-17 is fixed by reference to published population estimates (from ONS).
- 1.7 The report is split into a number of short sections considering a range of different outputs related to the new projections. These are summarised below:
- Section 2: Population and Household Growth;
  - Section 3: Housing Market Signals and Affordable Housing Need;
  - Section 4: Economic-Led Housing Need; and
  - Section 5: Conclusions.

## 2 POPULATION AND HOUSEHOLD GROWTH

2.1 This section sets out the projected population growth in the 2016-based SNPP and compares the findings to the 2014-based SNPP figures. However, it is worthwhile understanding historic growth to contextualise this data.

2.2 As shown in the figure below growth in York has seen significantly faster growth than any of the wider comparators over the last 26 years and particularly since the millennium. Since around 2004, population growth has broadly tracked nationwide growth, this is a faster rate of growth than observed across North Yorkshire or the region.

**Figure 1: Population Growth (1991-2017)**



Source: ONS, Mid-Year Population Estimates, 2018

2.3 The table below shows projected population growth from 2016 to 2039 in the City of York and a range of comparator areas. The data shows that the population of York is projected to grow by around 17,600 people. This is an 8.5% increase – this is below the projected increase nationally but notably above the projected increase in the region and for North Yorkshire.

**Table 1: Projected Population Growth (2016-39) – 2016-based SNPP**

	Population 2016	Population 2039	Change in population	% change
York	206,920	224,542	17,622	8.5%
North Yorkshire	609,538	628,028	18,490	3.0%
Yorks/Humber	5,425,370	5,779,821	354,451	6.5%
England	55,268,067	61,534,998	6,266,931	11.3%

Source: ONS

2.4 It is also possible to compare the 2016-based SNPP with the previous full set of projections (the 2014-based SNPP). This comparison is shown for York in the table below. This shows that the latest projections show a very significantly lower level of population growth (12,000 fewer people – equivalent to a 41% reduction in projected population growth) over the 2016-39 period.

**Table 2: Projected Population Growth (2016-39) – comparing projection releases**

	2014-based SNPP	2016-based SNPP	Difference
York	29,622	17,622	-12,000

Source: ONS

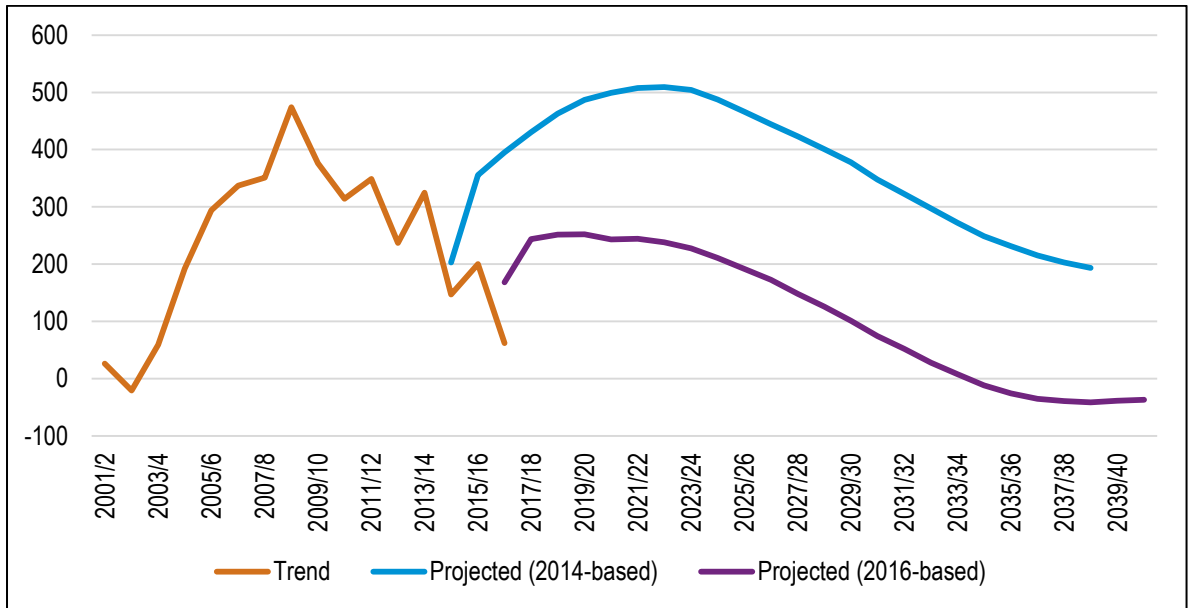
2.5 The reason for such a reduction stems from the 2016 National Population Projections. The national reduction can be explained by the following:

- ONS' long-term international migration assumptions have been revised downwards to 165,000 per annum (beyond mid-2022) compared to 185,000 in the 2014-based projections. This is based on a 25-year average;
- The latest projections assume that women will have fewer children, with the average number of children per woman expected to be 1.84 compared to 1.89 in the 2014-based projections; and
- ONS is no longer assuming a faster rate of increase in life expectancy of those born between 1923 and 1938, based essentially on more recent evidence. Life expectancy still increases, just not as fast as previously projected.

2.6 In examining how these have influenced population growth at a York level we have looked at each of the main components of change. The first of which is natural change (births – minus deaths). As shown in the figure below neither the 2014 nor 2016-based projections have an immediately obvious relationship with past trends.

2.7 However, on balance given the more recent trend of falling rates the 2016-based projections looks to reflect this to a greater extent than the 2014-based projections which show an immediate and significant improvement which is not founded on the most recent trends.

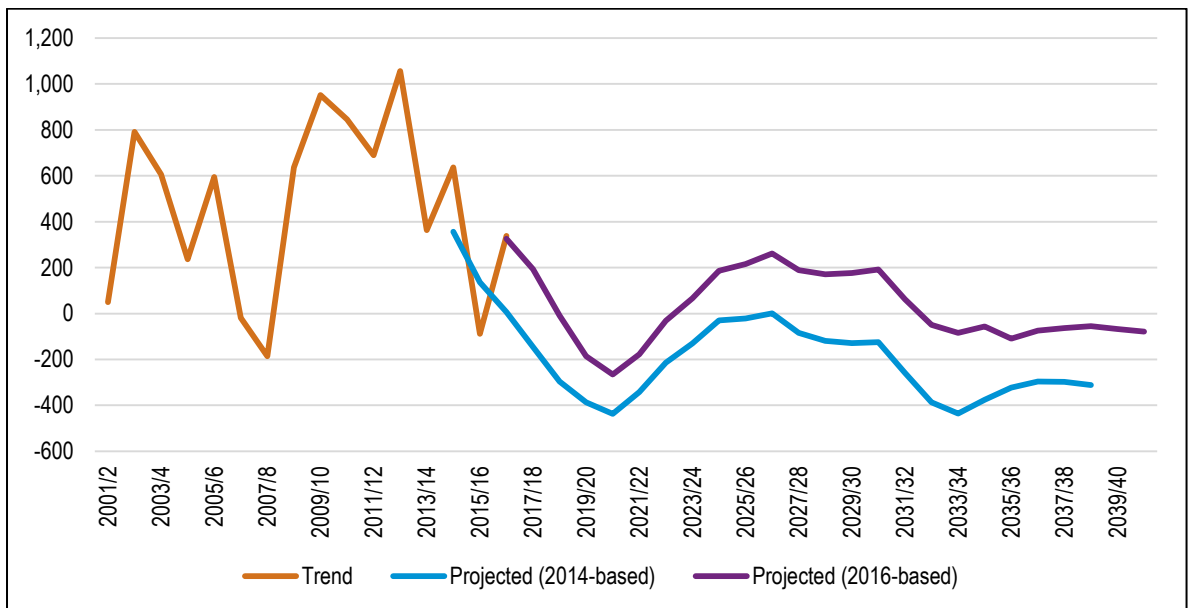
**Figure 2: Past and Projected Trends in natural change – York**



Source: ONS

2.8 As shown in Figure 3 for net internal migration the 2016-based population projection is actually slightly more positive than its predecessor. It would also more closely align with more recent trends as the 2014-based projection has a substantial and immediate fall greater than has subsequently been estimated as having actually occurred.

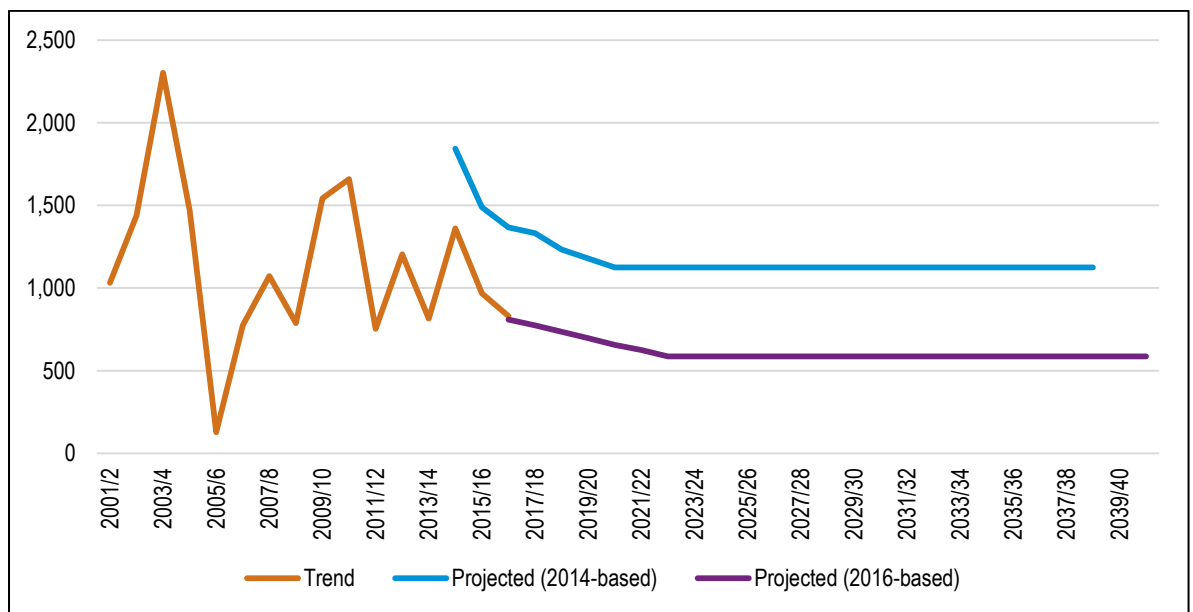
**Figure 3: Past and Projected Trends in net internal migration – York**



Source: ONS

- 2.9 However, the most significant difference arrives with the review of international migration. Neither trend projects any change beyond 2021 but the 2016- based trend more closely follow on from the more recent trends.

**Figure 4: Past and Projected Trends in net international migration – York**



Source: ONS

- 2.10 By examining the Mid-Year Population Estimates for the interim period since their release it is also now known that the first few years of the 2014-based projection have been inaccurate for the City. As shown in the table below, migration within the 2014-based projection was significantly higher than actually recorded by ONS.
- 2.11 The same exercise can also be undertaken for the single year since the publication of the 2016-based projections. This shows a very close level of alignment albeit slightly lower than what actually happened.

**Table 3: Comparing recorded migration (in the MYE) and projected levels**

	MYE recorded	2014-based SNPP	2016-based SNPP
2014/15	1,360	1,844	-
2015/16	968	1,489	-
2016/17	831	1,366	808

Source: ONS

- 2.12 As a final sense check we can also observe that the Patient Register shows lower growth than the MYE, adding weight to the 2014-based SNPP being too high and giving further credence to the 2016-based population projection.

**Table 4: Estimated population change (2011-2017) using different sources– York**

	Population 2011	Population 2017	Change in population	% change
MYE	197,790	208,200	10,410	5.3%
Patient Register	203,430	211,870	8,440	4.1%

Source: ONS

### Alternative Demographic Scenarios

- 2.13 As well as reviewing the official projections the guidance also advises consideration of more recent evidence (MYE) and examining any potential short-term influences on the demographic projections. This may include any particular contractions or growth in the population in the period feeding into the projections (2010/11 to 2016 for the latest projections).
- 2.14 In order to mitigate against any shorter term trends we have sought to look at trends over a longer (10-year) period. This is a fairly commonplace timeframe to examine trends when undertaking this type of work. We have therefore developed two further scenarios:
- Including 2017 mid-year population data and retaining other assumptions in the SNPP – 2016-SNPP (+MYE); and
  - Implications of 10-year migration trends – 10-year migration
- 2.15 As demonstrated in the table below these alternative scenarios do not diverge substantially from the latest population projection but also that 2014-based SNPP is very much the outlier of the scenarios examined.

**Table 5: Projected population growth (2012-2037) – alternative scenarios – York**

	Population 2012	Population 2037	Change in population	% change
2014-based SNPP	200,018	236,366	36,348	18.2%
2016-based SNPP	199,567	223,603	24,036	12.0%
2016-SNPP (+MYE)	199,567	224,035	24,468	12.3%
10-year migration	199,567	225,645	26,078	13.1%

Source: Demographic projections

### Household Growth

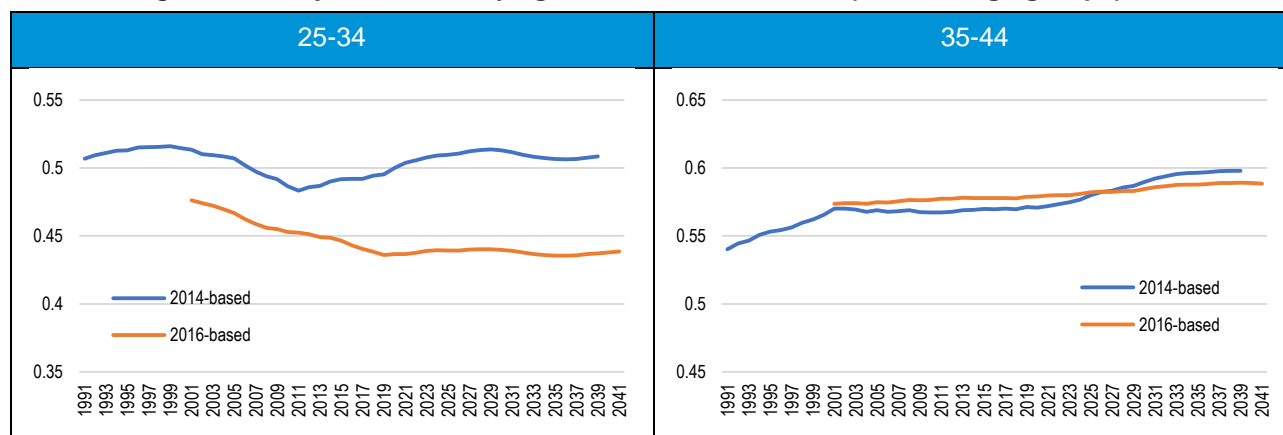
- 2.16 Having studied the population growth and the age/sex profile of the population the next step in the process is to convert this information into estimates of the number of households in the areas. To do this, the concept of headship rates (or reference rates) is used. Headship rates can be described in their most simple terms as the number of people who are counted as heads of households (or the more widely used Household Reference Person (HRP)).



- 2.17 The latest sets of household reference rates were published as part of the 2016-based subnational household projections (SNHP) in September by ONS<sup>1</sup>. However, it is fair to say they have not been met uncritically.
- 2.18 The criticism mostly stems from the fact that the new projections do not have the ability to meet the Government's housing target of 300,000 homes per annum once the standard methodology is applied to them.
- 2.19 The methodology for the population projections which underpin the household projections has not faced much criticism as this has not changed. However, the responsibility for production of the household projections has changed from the MHCLG to ONS and as a result some changes have been implemented.
- 2.20 The main change is the period from which household formation rates trends have been drawn. Previously these were based on trends going back to 1971 but in the most recent projections trends have only been taken from 2001.
- 2.21 It is argued that by focussing on shorter term trends ONS have effectively locked in deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time.
- 2.22 The figure below illustrates the impact of this in York for those aged 25-34 and 35-44. For the oldest of these age groups household formation appears largely unaffected although they do eventually fall behind the 2014-based rates. However, for the 25-34 age group the 2016-based projections show a much lower level of household formation with (unlike the 2014-based projections) no improvement going forward.

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<sup>1</sup> Note that although the 2016-based household projections were published after the 2017 Mid-Year Population Estimates they did not incorporate the latter.

**Figure 5: Projected HRRs by age of head of household (selected age groups) – York**

Source: Derived from ONS and CLG data

2.23 The question remains whether this is both an accurate assessment of current and future household formation and also positive planning to assume that certain age groups will not be able to form households in the same way that they once did.

2.24 To examine this further we have used three different household representative rate scenarios. These scenarios have been used as described below:

- Linking directly to 2016-based SNHP – 2016-SNHP HRRs;
- Linking directly to 2014-based SNHP – 2014-SNHP HRRs; and
- Linking to the 2014-based SNHP but with a part-return to previous trends for the 25-34 and 35-44 age groups – 2014-PRT

2.25 The last of these scenarios was initially suggested by the Local Plans Expert Group in their now defunct standard methodology proposal and while they hold no weight in guidance terms, they do address deterioration within even the 2014-based HRR.

2.26 The result of applying these rates to the 2016-based population growth figures (as set out in Table 5) is shown below. This also includes a vacancy rate of 3% (a fairly standard number to use in assessments of this nature). The official projections result in a need for 484 dpa. This according to the planning practice guidance is the official starting point for assessing need and from which any market signals adjustment should be benchmarked.

2.27 The analysis using alternative HRR show a significantly higher level of growth reflecting the difference between the forecasts, the extent of deterioration in HRR and the scale of the 25-34 age group.

2.28 The use of the 2014-based HRR in York would increase the housing need to 610 dpa when applied to the 2016-based population projections. This increases further when the PRT HRR applies

resulting in a housing need of 660 dpa. For the full period this scenario results in a need for 16,493 dwellings.

- 2.29 Such a level of need represents a 40% uplift above the starting point. If no other adjustments are required, then this would be the OAN i.e. if economic potential was low and there were few affordability pressures in the City. However, as the next two sections show, this is not the case in York and therefore this figure does not represent a robust OAN.

**Table 6: Projected Household Growth 2012-37 – 2016-based Population Projections**

	Households 2012	Households 2037	Change in households	Per annum	Dwellings Per Annum
2016-SNHP HRRs	83,522	95,266	11,744	470	484
2014-SNHP HRRs	84,064	99,320	15,256	610	629
Part-return to trend	84,064	100,556	16,492	660	679

Source: Derived from ONS and CLG data

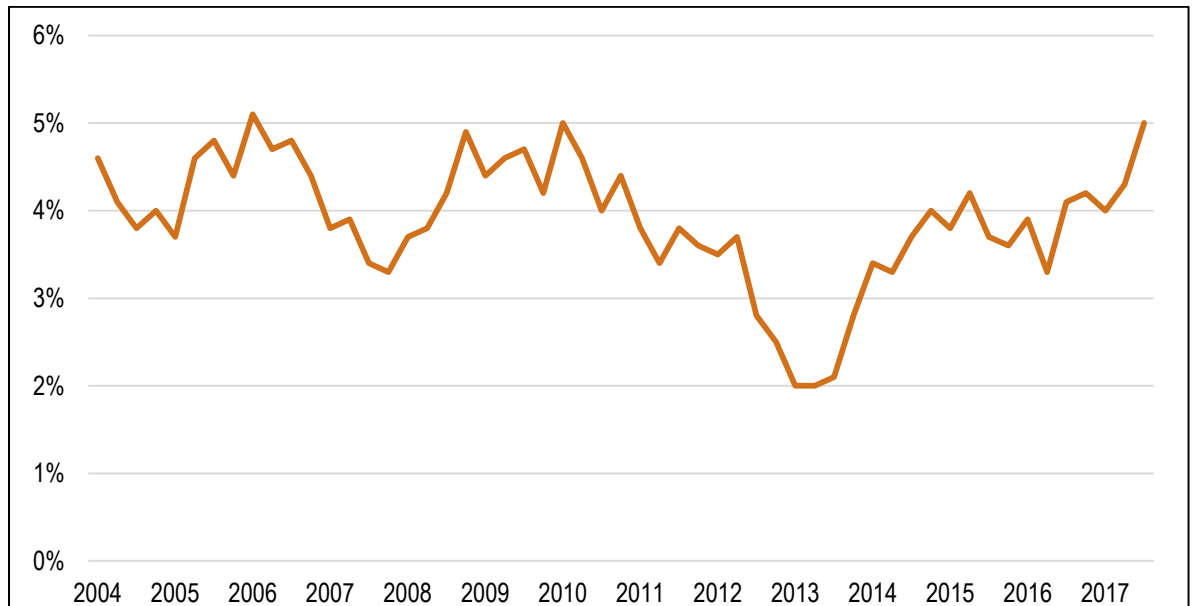
### 3 ECONOMIC LED HOUSING NEED

- 3.1 There are a number of documents which have tested the economic growth potential of the City of York using Oxford Economic and the Regional Econometric Model which is produced by Experian. The most recent of these was a sensitivity test undertaken using the REM outputs of December 2016 and were published in the ELR Update in September 2017 as part of the REG 18 consultation at Pre-Publication Plan stage.
- 3.2 Table 1 of the ELR update presents the different scenarios over the period 2015 to 2031 as this was the time period looked at in the original Oxford Econometrics (OE) forecasts in the ELR 2016. This included Scenario 2 which was a locally led adjustment to the OE baseline to reflect local circumstances.
- 3.3 The ELR Update concluded that Scenario 2 was the most appropriate to take forward within the draft Local Plan. Before this occurred, the scenarios had to be moved onto a 2014 baseline as shown in Table 2 of the ELR update taking account of BRES change in the period 2012 to 2014.
- 3.4 This shows that the total forecast jobs growth for Scenario 2 it is +11,050 jobs over the remaining 17 years of the plan period (2014-31) reducing the economic growth potential in the City of York to 650 jobs per annum.

#### Modelling Assumptions

- 3.5 To consider the level of housing provision which might be needed to support the expected growth in jobs we need to make a number of modelling assumptions. Firstly, we have assumed that there will be no improvements to unemployment post 2017.
- 3.6 The second of which takes into account the number of people with more than one job (double-jobbing). At present around 3.3% of those working in York hold down more than one job. We have assumed this stays constant. This is taken from the long-term average from the Annual Population Survey (APS) and is set out in Figure 1 below.

**Figure 6: Percentage of all people in employment who have a second job (2004-2017) – York**



Source: Annual Population Survey (from NOMIS)

- 3.7 Similarly, we have assumed that commuting ratios as set out in the 2011 Census (which although dated is the best available evidence) also stay constant (see Table 7). As shown for every 1,000 people commuting in to the City for employment 959 commute out. There is therefore a very broad balance of commuting (actually a small net in-commute) and this is expected to continue to be the case.

**Table 7: Commuting patterns in York**

	Number of people
Live and work in Local Authority (LA)	62,209
Home workers	9,422
No fixed workplace	6,101
In-commute	25,734
Out-commute	21,451
Total working in LA	103,466
Total living in LA (and working)	99,183
Commuting ratio	0.959

Source: 2011 Census

- 3.8 Any changes to commuting patterns would need to be agreed with neighbouring authorities who may be relying on York residence to meet their economic growth.

- 3.9 Drawing these assumptions together it is possible to look at increase in resident workforce required to service the increase in number of jobs. As shown in the table below the 13,000 increase in jobs translates into an almost 12,000 increase in resident workforce.

**Table 8: Forecast job growth and change in resident workforce with double jobbing and commuting allowance (2017-37) – York**

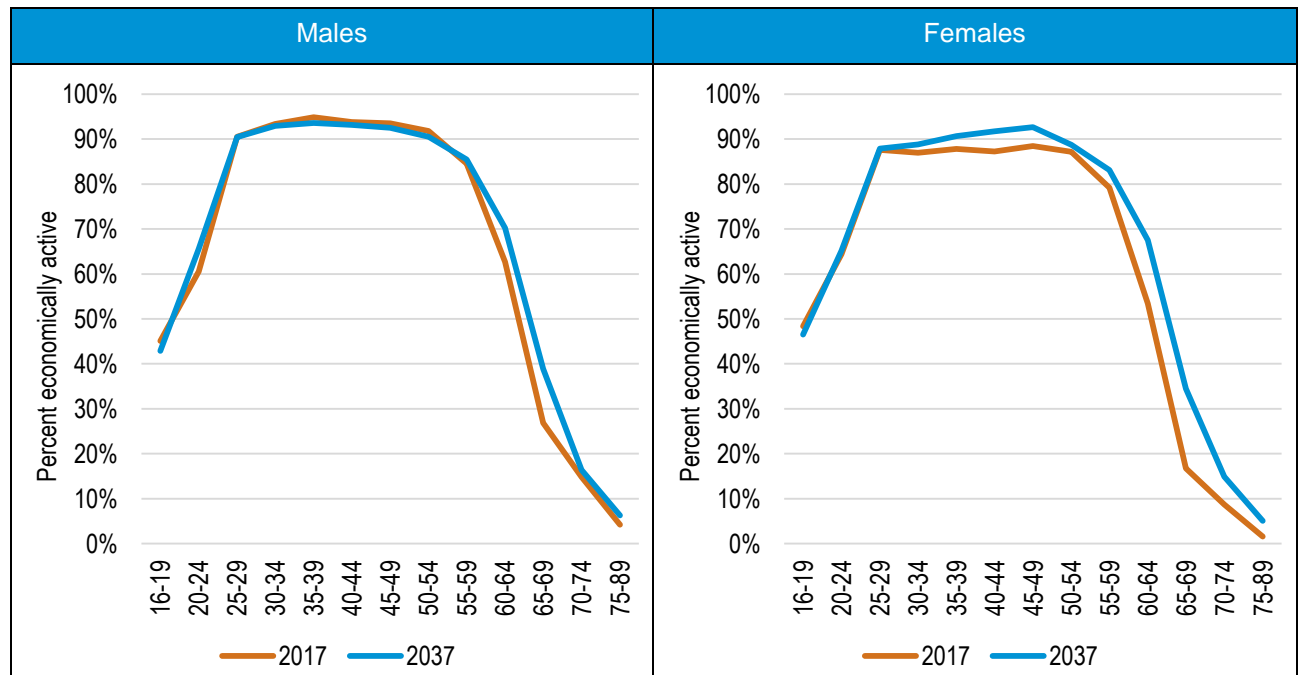
	LP (650 jpa)
Number of jobs (2017-37)	13,000
Double jobbing allowance	0.961
Number of workers required	12,493
Commuting ratio	0.959
Change in resident workforce	11,976

Source: Derived from a range of sources as described

- 3.10 The next stage recognises that not all of the population are economically active and seeks to model what level of population growth is required to provide the calculated increase in resident workforce. To do this we used assumptions on economic activity.

### Economic Activity Rates

- 3.11 The most contentious part of the modelling assumptions generally focuses on Economic Activity Rates. This relates to the percentage of population in each age group and sex who will be economically active (i.e. in employment or looking for employment).
- 3.12 For the purposes of this report (and in a departure from the previous SHMA) we have used the Economic Activity Rates (EAR) as published by the Office of Budgetary Responsibility (OBR) from summer 2018. We have modelled from 2017 onwards assuming 650 jobs per annum through to 2037.
- 3.13 As shown in the figure below Economic Activity increases are assumed to occur in all male age groups from 55 onwards and for all woman aged 25 onwards. This reflects a wide range of factors but most notably increases to the state pension age and the trends for woman to be working in greater numbers and for longer.

**Figure 7: Projected changes to economic activity rates (2017 and 2037) – York**

Source: Based on OBR and Census (2011) data

3.14 This data has also been tabulated below and shows in particular the increase in those aged 60 to 69 linked directly to the change in pensionable age. There is also some reduction in the economic activity of those aged 16-19. This can be attributed to recent trends linked to changes to the compulsory education leaving age.

**Table 9: Projected changes to economic activity rates (2017 and 2036) – York**

	Males			Females		
	2017	2037	Change	2017	2037	Change
16-19	45.1%	42.9%	-2.2%	48.4%	46.5%	-1.8%
20-24	60.5%	65.6%	5.1%	64.4%	65.1%	0.7%
25-29	90.5%	90.4%	0.0%	87.6%	87.9%	0.3%
30-34	93.4%	92.9%	-0.4%	87.0%	88.8%	1.8%
35-39	94.8%	93.5%	-1.3%	87.8%	90.7%	2.9%
40-44	93.8%	93.1%	-0.7%	87.2%	91.7%	4.5%
45-49	93.5%	92.5%	-1.0%	88.5%	92.7%	4.2%
50-54	91.8%	90.5%	-1.3%	87.1%	88.7%	1.6%
55-59	84.5%	85.5%	1.0%	79.2%	83.1%	3.8%
60-64	62.6%	70.2%	7.6%	53.4%	67.5%	14.1%
65-69	26.8%	38.9%	12.1%	16.8%	34.5%	17.7%
70-74	14.8%	16.4%	1.6%	8.7%	14.9%	6.2%
75-89	4.2%	6.3%	2.1%	1.6%	5.1%	3.5%

Source: Based on OBR and Census (2011) data

- 3.15 The modelling starts with the official population projections and applies these economic activity rates to them. The official projections however do not provide enough of an increase in resident workforce to service the anticipated jobs growth using these economic activity rates.
- 3.16 In this circumstance the model then increases in migration (both international and internal) and decreases out-migration (both international and internal) by the same amount until the required increase in resident employment is achieved.
- 3.17 The final step is to translate this increase in population in to households and dwellings. As with the demographic growth we have run a number of scenarios in household representative rates and included a 3% vacancy allowance, the results of which is shown below.

**Table 10: Projected housing need with different HRR scenarios (Local Plan job growth) – York**

	Households 2012	Households 2037	Change in households	Per annum	Dwellings (per annum)
2016-SNHP HRRs	83,522	97,830	14,308	572	590
2014-SNHP HRRs	84,064	101,901	17,837	713	735
Part-return to trend	84,064	103,241	19,177	767	790

Source: Demographic projections

- 3.18 Using the official HRRs from the 2016-based projections results in a need for 590 dwellings per annum. This again assumes that the deterioration in household formation within younger age groups is acceptable.
- 3.19 However, by using the part return to trend HRRs we are again making the required improvements to avoid locking in these historic deteriorations and ensuring that these improve in future. Such an assumptions results in an **economic led housing need of 790 dwellings per annum.**
- 3.20 Only by providing this level of growth would the population be sufficient to meet the economic growth while also ensuring that there will be improvements to household representation rates among younger persons.
- 3.21 Any level of delivery below this will result in a combination of restricted economic growth (businesses not growing or moving out the City), unsustainable commuting patterns (increasing congestion and over-crowded public transport) or reduced household formation rates (greater levels of HMOs and/or non-dependent children living with their parents for longer and in greater numbers).

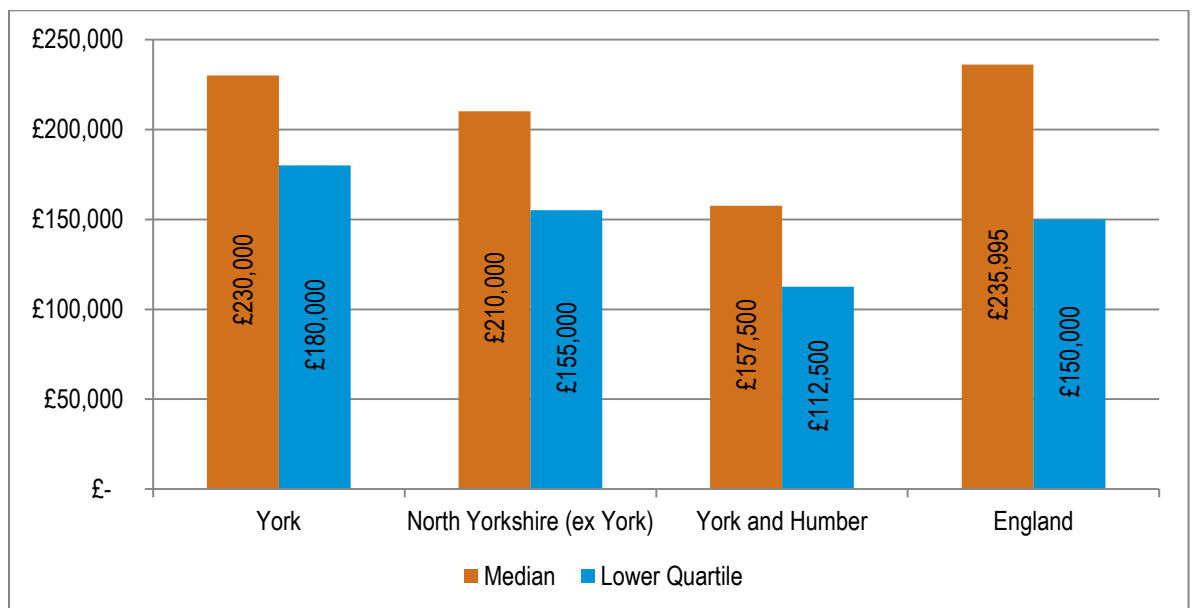


## 4 MARKET SIGNALS

### House Prices

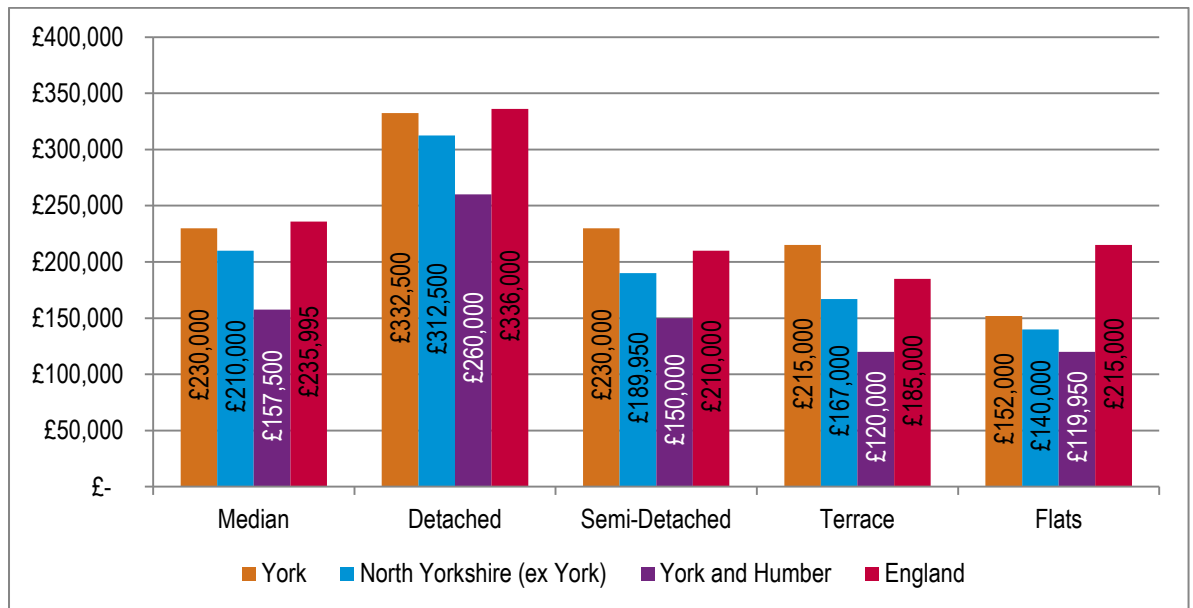
- 4.1 As shown in the figure below, the median house price in York sits at £230,000, near parity with England's median value of £235,995. The City is also more expensive than the North Yorkshire and Yorkshire and Humber equivalents of £210,000 and £157,500 respectively.

**Figure 8: Median and Lower Quartile House Prices (2017)**



Source: HM Land Registry, 2018

- 4.2 Perhaps even more interesting to note is that lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. Relatively higher values within a lower quartile housing range suggests that those with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property.
- 4.3 On examining house prices by type in summary we have identified that for detached, semi-detached, terrace and flats prices are all higher in York than for the County and Regional comparators. This is also the case for semi-detached and terraced homes in comparison to England.

**Figure 9: House Prices by Type, 2018**

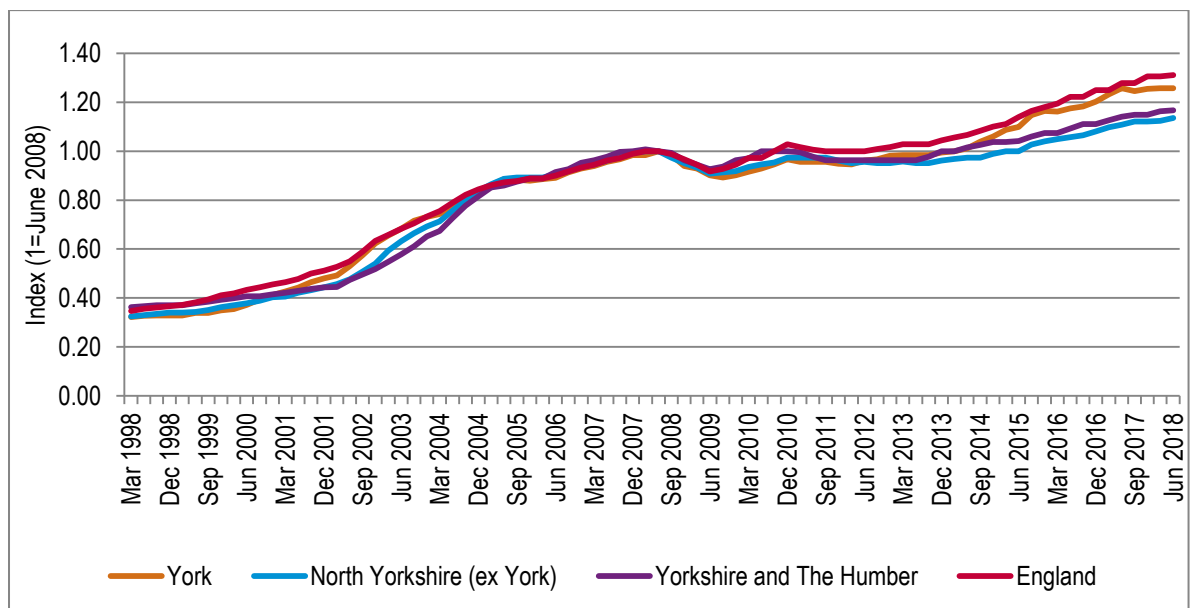
Source: HM Land Registry, 2018

- 4.4 Cost analysis based on detached houses reveals that the properties in York, valued at £332,500 are similar in value to the rest of England at £336,000. They are £20,000 higher than surrounding North Yorkshire and £72,500 higher than the Yorkshire and Humber region.
- 4.5 Analysis of semi-detached house prices reveals that median values in York are £230,000, this is some £20,000 higher than England, £40,050 higher than surrounding North Yorkshire figure and £80,000 greater than the Yorkshire and Humber region.
- 4.6 Terraced house price analysis reveals that in York the median value is £215,000, £30,000 higher than England, £48,000 higher than surrounding North Yorkshire and £95,000 greater than the Yorkshire and Humber region.
- 4.7 Finally, cost analysis based on flats reveals that those types of properties in York are valued at £152,000, £63,000 lower than England, £12,000 higher than surrounding North Yorkshire and £32,050 greater than the Yorkshire and Humber region.
- 4.8 Most interesting to note are that semi-detached and terraced homes are more expensive than all the other geographies, suggesting a shortage of housing related to this type. Flats, however, are a different case to the rest of England despite still being more expensive than its surrounding geography. One possible reason for the lower value of flats may be relating to the quality and size of the stock in the City.

## House Price Change

- 4.9 The figure below reveals the indexed median house price change relative to values from 1998 to 2018. These are indexed to 2008 levels to show pre and post-recession changes. The graph can reveal the pace at which median house prices are rising or falling over time relative to the other geographies.
- 4.10 Most notably, the gap of growth between York and the surrounding North Yorkshire county has widened from 10 years ago. Since 2008 (the last recession), median housing price change for York has been approx. 1.25, more similar to the growth of prices for England overall sitting at 1.30.
- 4.11 The North Yorkshire county and Yorkshire and the Humber region, on the other hand, sit closer to just a change of 1.10. This divergence also shows a larger gap in house price change between the four geographies than at any time in the 20-year period, as visually shown below.

**Figure 10: Indexed Median House Price Change (1998-2018)**



Source: ONS based on Land Registry Data, 2018

## Rental Market

- 4.12 The table below shows rental growth in York, Yorkshire and Humber, and England over the past one and five years, along with the relative growth figures for the lower quartile. The table reveals the pace at which median rental prices are rising or falling relative to properties on the lower end.
- 4.13 Of particular interest is the trend related to median rental growth. Median rental values in York are £745, £70 higher than the rest of England and £220 higher than Yorkshire and Humber region. In

the past five years, rental values have increased by 10%, 5% less than in England (15%). In the past year, however, prices have increased by 3% whereas there has been no growth for the rest of England and only 1% growth in the Yorkshire and Humber region. Indicating a narrowing of trends.

**Table 11: Median and Lower Quartile Monthly Rents (2018)**

	Median	1 Year Growth	5 Year Growth	Lower Quartile	1-year LQ Growth	5 Year LQ Growth
York	£745	3%	10%	£625	5%	14%
York & Humber	£525	1%	8%	£430	1%	9%
England	£675	0%	15%	£500	0%	11%

Source: Valuation Office Agency, 2018

- 4.14 In the lower quartile, more notably, York's rental growth has outpaced the rest of the country by 3%, sitting at total value increase of 14%. Similarly, rental prices have surged in the past year by 5% whereas there has been no increase in England.
- 4.15 The data demonstrated that rental housing has overall become more unaffordable in the past five years, but increasingly so amongst lower-value properties. This could be directly linked to a lack of affordability in the purchase market forcing a greater level of competition for rental properties.

### Affordability

- 4.16 The table below shows the median and lower quartile affordability ratios of York, Yorkshire and Humber, and England in 2017, along with their 5-year change in values. The table demonstrates the relationship between incomes of those working in the City relative to property values.

**Table 12: Median and Lower Quartile Affordability Ratios (2017)**

	Median	5 Year Change	LQ 2017	5 Year Change
York	8.62	1.88	7.26	0.68
North Yorkshire	8.16	0.51	5.73	0.55
Yorkshire & Humber	5.90	0.55	-	-
England	7.91	1.14	9.11	1.38

Source: MHCLG, 2018

- 4.17 At the median level, York has the highest affordability ratio, and thus the least affordable housing, relative to surrounding North Yorkshire, Yorkshire and Humber, and England. In addition, the affordability ratio in York has also increased the most in the past five years relative to the other geographies – indicating a significant worsening in affordability.
- 4.18 The table also shows the lower quartile values and growth, although this data has not been published at a regional level. Affordability at a lower quartile level is relatively better and grew less than in England, however it still sits above the surrounding North Yorkshire equivalent at 7.26.

Despite appearing to be less than the rest of England, 7.26 is still high relative to incomes when compared to typical mortgage multiples.

- 4.19 The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.

### Affordable Housing Need

- 4.20 The other necessary consideration in determining the scale of an affordability uplift for the calculation of OAN is affordable housing need. There has been no reassessment of affordable housing need within this short update report. The previous SHMA identified a net affordable housing need of 573 dwellings per annum.
- 4.21 The affordable housing evidence suggests that a modest uplift to the demographic-based need figure to improve delivery of affordable housing in the City may be justified. We have examined the key judgements as an illustration of the most appropriate response.

### Kings Lynn v Elm Park Holdings (July 2015)

- 4.22 The case of Kings Lynn and West Norfolk Council vs. SSCLG and Elm Park Holdings, decided in July 2015, involved the Council's challenge to an inspector's granting of permission for 40 dwellings in a village. Although much of the case was about the approach to take with regards to vacant and second homes, the issue of affordable housing was also a key part of the final judgment.
- 4.23 Focussing on affordable housing, Justice Dove considered the "ingredients" involved in making a FOAN and noted that the FOAN is the product of the Strategic Housing Market Assessment (SHMA) required by paragraph 159 of the NPPF. It is noted that the SHMA must identify the scale and mix of housing to meet household and population projections, taking account of migration and demographic change, and then address the need for all housing types, including affordable homes.
- 4.24 He continued by noting that the scale and mix of housing is '*a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgement*'. Crucially, in paragraph 35 of the judgment he says that the '*Framework makes clear that these needs [affordable housing needs] should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice*'.

- 4.25 This is an important point, given the previous judgements in Satnam and Oadby & Wigston. And indeed, in relation to Oadby and Wigston he notes that *'Insofar as Hickinbottom J in the case of Oadby and Wigston Borough Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG'*.
- 4.26 Therefore, this most recent judgement is clear that an assessment of affordable housing need should be carried out, but that the level of affordable need shown by analysis does not have to be met in full within the assessment of the FOAN. But should still be a consideration *in determining the FOAN*.
- 4.27 The approach in Kings Lynn is also similar to that taken by the inspector (Simon Emerson) to the Cornwall Local Plan. His preliminary findings in June 2015 noted in paragraph 3.20 that *'National guidance requires consideration of an uplift; it does not automatically require a mechanistic increase in the overall housing requirement to achieve all affordable housing needs based on the proportions required from market sites.'* A number of similar conclusions have been drawn at other local plan examinations.
- 4.28 It seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to *consider* an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a "mechanical way" whereby the affordable need on its own drives the OAN.

### Implications of Housing Market Signals

- 4.29 The updated market signals show that housing affordability is a worsening issue in York. House prices have increased in the past year and the affordability ratio between house prices and earnings has worsened. The housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate.
- 4.30 PPG sets out that "A worsening trend in any of the housing market signals indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections". In the context of the PPG, the appropriate test is therefore whether an upward adjustment should be made from the starting point household projections to take account of market signals.

4.31 There is however no guidance as to what an appropriate upwards adjustment should be instead the PPG sets out that it should be “at a level that is reasonable”. There have been a number of inspectors’ reports which have examined what is “reasonable”. These are set out below.

### Inspectors’ Views on Market Signals Uplifts

4.32 Two of the earliest inspectors’ reports where market signals were considered in detail are in Eastleigh and Uttlesford. In both cases different inspectors suggested that the local authorities should consider increasing housing need by 10% as a result of the evidence. Key quotes from these reports are provided below.

- Eastleigh (February 2015) – *‘It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the “modest” pressure of market signals recognised in the SHMA itself’*
- Uttlesford (December 2014) – *‘I conclude that it would be reasonable and proportionate, in Uttlesford’s circumstances, to make an upward adjustment to the OAN, thereby increasing provision with a view to relieving some of the pressures. In my view it would be appropriate to examine an overall increase of around 10%...’*

4.33 However more recently some inspectors have taken a stronger approach to market signals adjustments this includes:

- Waverley where the inspector applied a 25% uplift based on a median affordability ratio of 15.45;
- Mid Sussex where the inspector applied a 20% uplift based on a median affordability ratio of 12.6;
- Canterbury where the inspector applied a 20% uplift based on a median affordability ratio of 10.6;

4.34 All of the above examples are in locations where affordability is worse than in York. This would suggest that an uplift to these extents would be unnecessary. However, an uplift in the region of 15% would seem reasonable. Such an uplift applied to the demographic starting point (484 dpa) would arrive at an OAN of 557 dpa.

4.35 This is some way short of both the adjusted demographic growth and the economic growth. Therefore, the OAN should remain as 790 dwellings per annum in order to achieve both improvements to household formation and meet economic growth. This equates to an increase of 63% from the start point.

## 5 CONCLUSIONS

- 5.1 Overall, the 2016-based subnational population projections (SNPP) for York show an average annual population growth (2012-37) of 24,036, lower than the previous (2014-based) figure of 36,348 for the same period (12-37). Incorporating the latest mid-year population estimates off-sets this reduction to 24,468 persons over the same period.
- 5.2 Our analysis on the components of population change suggests that the 2016-based population projections provide a more robust assessment of population growth for York than their predecessor. This is also ratified by more recent population estimates.
- 5.3 To translate the 2016-based population projections into household growth and dwellings we ran a series of sensitivities on household representative rates and applied a vacancy rate of 3%.
- 5.4 The household formation rates analysis potentially identifies a constraint within the official household projections, particularly for those aged 25-34. We therefore developed an alternative scenario whereby the rates in this age group (and those aged 35-44) are part returned to those set out within the 2008-based projections (pre-recession).
- 5.5 These calculations resulted in a fairly wide range of growth of between 489 dpa to 679 dpa. Whereby the official projections are at the lower end of the range and the forecasts with adjusted HRR at the upper end.
- 5.6 In accordance with Planning Practice Guidance (PPG), we next considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability.
- 5.7 We have calculated the housing need required to meet an economic growth of 650 jobs per annum (based on the ELR Update and Draft Local Plan). Using a series of assumptions including economic activity rates from the Office of Budget Responsibility (OBR) resulted in an economic led need for housing of up to 790 dpa. This includes an adjustment to household formation rates.
- 5.8 We have also provided an updated analysis of housing market signals. These show that house prices are relatively high in York and that housing affordability is a significantly worsening issue over the last five years. This report has not re-assessed affordable housing needs. The SHMA had previously identified an affordable housing need of 573 dpa.
- 5.9 In accordance with Planning Practice Guidance (PPG), an uplift to improve affordability is required. Considering the above factors, we proposed a 15% uplift based on recent decisions and the significantly worsening affordability in York.



- 5.10 When applied to the demographic starting point (484 dpa) this 15% uplift would result in an OAN of 557 dpa. This some way short of the economic led need of 790 dpa.
- 5.11 This report therefore concludes that the OAN in York is 790 dpa. This would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.
- 5.12 Only by providing this level of housing growth would the population be sufficient to meet the economic growth potential while ensuring that there will be improvements to household representation rates among younger persons.
- 5.13 Any level of delivery below this will result in a combination of restricted economic growth (businesses not growing or moving out the City), unsustainable commuting patterns (increasing congestion and over-crowded public transport) or reduced household formation rates (greater levels of HMOs and/or non-dependent children living with their parents for longer and in greater numbers).

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Inspector Simon Berkeley BA MA MRTPI and  
Inspector Andrew McCormack BSc(Hons) MRTPI Date: 29<sup>th</sup> January 2019  
C/O Carole Crookes  
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Dear Mr Berkeley and Mr McCormack

Many thanks for your letter dated 14<sup>th</sup> December regarding the examination of the City of York Local Plan. In our previous letter of 13<sup>th</sup> November we advised that we had been in dialogue with the Ministry of Housing, Communities and Local government (MHCLG) regarding the assessment of housing need in the light of the publication of the revised 2016 sub national population projections and household projections in May and September 2018 respectively.

Whilst it is clear that York's Local Plan has been submitted and is therefore subject to the transitional arrangements applying the 2012 National Planning Policy Framework (NPPF) we take the view that in order to achieve a robust and up to date Plan it is necessary to consider the implications of the newly published national evidence before a final OAN figure is settled through the examination process.

Both the NPPF (2012) and the associated PPG with regards to housing needs assessments are clear that the latest household projections published by the Office for National Statistics (ONS) should provide the starting point estimate of overall housing need.

The PPG is clear that wherever possible, local needs assessments should be informed by the latest available information and the NPPF is clear that Local Plans should be kept up-to-date. It is also clear that 'a meaningful change' in the housing

situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued<sup>1</sup>.

The Office for National Statistics (ONS) released revised sub national population projections (2016-based) in May 2018 post the submission of the York Local Plan which show a marked discrepancy with the previous 2014 based figures on which our current OAN is calculated. This was further confirmed by the release of the 2016 based sub-national household projections by ONS in September 2018. We advised in our previous response that we would be conducting a review of the OAN in the context of the newly released evidence and that we would update you on its conclusions early in the New Year.

This review has now been undertaken by consultants GL Hearn and is enclosed for your consideration. The enclosed SHMA Update report advises that York's OAN is 790 dwellings per annum. This is based on a detailed review of the latest published evidence including the national population and household projections and the latest mid year estimate. The review has been undertaken based on applying the requirements of the National Planning Practice Guidance in relation to the assessment of housing need, under the 2012 NPPF. This confirms to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements.

#### Habitat Regulations Assessment (HRA)

Following submission of the Local Plan in May 2018 we received correspondence from Natural England regarding the HRA (CD012). Natural England stated in their letter dated 4<sup>th</sup> June 2018 (EX/CYC/1) that in reference to recreational disturbance at Strensall Common SAC they '*welcome the additional assessment and further mitigation and avoidance measures set out in section 4 of the HRA. However we remain of the opinion that insufficient evidence has been provided to back up the*

---

<sup>1</sup> Paragraph 016. Planning Practice Guidance

*conclusion of no adverse effects on integrity. We would expect to see a robust and comprehensive visitor assessment'.*

The Council responded to Natural England on 19<sup>th</sup> June 2018 (EX/CYC/2) to advise that whilst we were satisfied that our HRA is adequate without the need for further supporting evidence we were in a position to commission expert advice in the form of a visitor survey to seek to address the matters that Natural England had raised without impacting on the examination timetable and in order for the outputs to inform, if necessary, the identification of further appropriate pragmatic and deliverable mitigation measures. We advised that we would commission the visitor survey as expeditiously as possible and that we would welcome working with NE to agree the visitor survey methodology to ensure it meets expectations.

The Visitor survey was commissioned in June 2018 using expert consultants Footprint Ecology and the methodology was discussed and agreed with Natural England in July 2018. Surveys were undertaken in August and September at the Strensall Common SAC and the Lower Derwent Valley SPA and a final draft report was issued in December 2018. This report has now been shared with Natural England who are in a position to meet with us and our HRA consultants on Monday 4<sup>th</sup> February 2019. We will be in a position to update you on any implications for the submitted Local Plan following this meeting.

### Green Belt

The outcomes of the meeting with Natural England may result in implications for the addendum to Topic Paper 1 (Approach to York's Greenbelt) that PINS require in advance of timetabling of the hearing sessions and the drafting of matters, issues and questions. It is anticipated that should any outcomes from Natural England result in main modifications to sites that we would be in a position to put these forward to the Planning Inspectorate by mid March, together with the comprehensive addendum to the existing Topic Paper 1 – Approach to York's greenbelt [TP1] that provides additional clarification to the matters raised in your letter of 24<sup>th</sup> July 2018.

We will continue to keep you updated as to how these matters outlined progress and please do not hesitate to get in touch should you require any further information.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Neil Ferris', with a stylized flourish at the end.

Neil Ferris

Corporate Director - Economy and Place



## Habitats Regulations Assessment of the City of York Council Local Plan

19 February 2019

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### Quality Assurance – Approval Status

This document has been prepared and checked in accordance with  
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

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<b>Issue</b>	<b>Date</b>	<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>
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#### Comments

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Second

#### Comments

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## SUMMARY

The City of York Council (the *Council*) formally submitted its Regulation 19 Publication Draft of its Local Plan in February 2018. This was accompanied by a Habitats Regulations Assessment (HRA) dated April, 2018. However, following comment by Natural England and the production of new evidence, it was found that the 2018 HRA had to be updated. This 2019 version of the HRA document replaces the 2018 edition and presents different outcomes.

The role of an HRA is to assess the impact of the proposed policies and allocations on the internationally important sites for biodiversity in and around the City. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites.

HRA asks very specific questions of a local plan. Firstly, it *screens* the plan to identify which policies or allocations may have a *likely significant effect on a European site, alone or (if necessary) in combination* with other plans and projects. If likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an *appropriate assessment* to find out if the plan will have *an adverse effect on the integrity* of the European sites. Typically, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out. If necessary, a plan should be amended to *mitigate* any problems, which usually means that some policies or allocations will need to be modified or, more unusually, may have to be removed altogether.

This document follows best practice (drawing heavily, in particular, on guidance contained within the Habitats Regulations Assessment Handbook<sup>1</sup>) and takes full account of policy and law. Where appropriate, this HRA also draws on previous draft HRAs completed in 2014 and 2017 and, in particular the 2018 HRA which accompanied the formal submission of the Plan.

The 2018 HRA concluded that the Plan would not have an adverse effect on the integrity of any European sites. This outcome was challenged by Natural England which prompted the production of visitor surveys at three European sites to assess the impact of recreational pressure - the Lower Derwent Valley, Skipwith Common and Strensall Common - and the re-evaluation of existing air quality data.

Natural England made similar comments in relation to the anticipated increase in air pollution associated with residential development promoted by the Plan with regard to the River Derwent and Strensall Common European sites. This too prompted further re-assessment.

In turn, this new evidence changed the outcomes of the previous HRA which are summarised below.

All policies plus associated allocations were screened; the individual outcomes of the initial screening of each policy and allocation can be found in Appendix B and are summarised in Tables 5 and 6. Overall, this HRA found that likely significant effects could be ruled out for the vast majority of policies and allocations which meant they could be excluded from any further scrutiny.

However, likely significant effects could not be ruled out alone in terms of Policies SS19/ST35, E18 and H59 because of anticipated increases in recreational pressure, changes to the hydrological regime and the effect of air pollution on the adjacent Strensall Common European site. Again, because of anticipated increases in recreational pressure, likely significant effects could not be ruled out alone for Policy ST33 on the Lower Derwent Valley European site. Finally, even though situated several kilometres from the Lower Derwent Valley, likely significant effects could not be ruled out alone for Policy SS13/ST15 for two reasons: again because of anticipated increases in recreational pressure but also for impacts on the bird communities of the European site that utilised land beyond the European site boundary.

<sup>1</sup> Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, November 2018 edition UK: DTA Publications Ltd



Accordingly, an appropriate assessment was carried out. The outcome of this further scrutiny was as follows:

With regard to air pollution, the evidence produced allowed a conclusion that an adverse effect on the integrity of the European sites could be ruled out, effectively confirming the outcomes described in the 2018 HRA.

In terms of recreational pressure, the additional work also confirmed that an adverse effect on the integrity could be ruled out at the Lower Derwent Valley, again effectively confirming the outcomes of the 2018 HRA.

At Strensall Common, in contrast, the survey identified, that there was existing evidence to show, *inter alia*, that the worrying of livestock by dogs was disrupting the grazing regime, an essential component of the management of the site. In addition, it calculated that access to the site was expected to increase by 24%, largely from the new residents of Policies SS19/ST35 and H59 and that the number of dogs would also rise. Furthermore, it raised doubts regarding the effectiveness of a range of mitigation measures. The survey concluded that (emphasis added):

*Given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse (effects on the sic) integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity.*

Natural England subsequently concurred with this statement.

This latest edition of the HRA found no reasons to disagree with this new evidence and opinion.

Taking full account of these outcomes, this HRA identified that the addition of policy changes to the employment area E18 was possible and would be sufficient to remove the threat of an adverse effect on the integrity of the site, enabling E18 to be retained in the Plan and to leave the outcome of the 2018 HRA effectively unchanged.

In contrast, uncertainty over the effectiveness of the mitigation measures embedded within Policies SS19/ST35 and H59 led to the conclusion that they were not sufficient to remove the threat of an adverse effect on the integrity of Strensall Common European site. Therefore, for the Plan to be adopted, it was found necessary to recommend, that SS19/ST35 and H59 should be removed from the Plan. This would represent both a major modification to the Plan and a departure from the 2018 HRA.

All other factors remain the same as described in the previous edition of this HRA. Therefore, provided that all the modifications suggested above are adopted, the Council would be able to ascertain that an adverse effect on the integrity of the European sites would be avoided.

Lastly, although this HRA has been prepared to help the Council discharge its duties under the Habitats Regulations, the Council is the competent authority and it must decide whether to adopt this report or otherwise.



## 1. INTRODUCTION

### Background

- 1.1. The City of York Council (the *Council*) has submitted its Regulation 19 Publication Draft of its Local Plan (February 2018). This will deliver the strategic vision and objectives in York over a 20 year period. When adopted, the Local Plan will influence all future development within the Council's boundaries.
- 1.2. The Habitats Directive requires local (or '*competent*') authorities to assess the impact of development plans on the Natura 2000 network of protected sites. The Directive is given domestic effect by the Habitats and Species Regulations 2018 <sup>2</sup> (the '*Habitats Regulations*'). In England, this requirement is implemented via a *Habitats Regulations Assessment (HRA)* which comprises a series of mandatory tests.
- 1.3. A draft HRA (Amec, 2014)<sup>3</sup> was prepared alongside a previous Local Plan Publication draft. However, consultation on this document and its supporting evidence base was halted following a decision by Full Council in October 2014 to undertake further work on the Local Plan evidence base in relation to housing numbers. Work continued to update the policies and portfolio of site allocations within the Plan until late 2017.
- 1.4. Subsequently, a further draft HRA was completed (Waterman, 2017)<sup>4</sup> to evaluate the impact of these changes to the Plan. However, this only comprised an initial 'screening assessment (alone)' and did not explore the in combination or appropriate assessment (or AA) stages.
- 1.5. In April 2018, the formal HRA (Waterman, 2018)<sup>5</sup> was submitted alongside the Local Plan as part of the Regulation 19 consultation exercise. It concluded, after carrying out an appropriate assessment that the Plan would not have an adverse effect on the integrity of any European site.
- 1.6. However, in its letter of 4 May 2018, when referring to the effects of recreational pressure, Natural England stated:
 

*(it did) not agree that adverse effects on integrity can be ruled out based on the evidence available.*
- 1.7. Natural England also raised concerns about the assessment of recreational pressure on Skipwith Common. Similar points were made regarding anticipated changes in air quality with regard to the River Derwent and Strensall Common.
- 1.8. In response to this advice, the Council carried out further analysis of nitrogen deposition on the River Derwent and Strensall Common from road traffic. In addition, visitor surveys of the Lower Derwent Valley, Skipwith Common and Strensall Common were commissioned which were published in February 2019.
- 1.9. The outcome of both these exercises prompted production of this further HRA.
- 1.10. For presentational reasons, the Lower Derwent Valley and Skipwith Common Surveys were combined into one report but it should be noted that the Lower Derwent Valley Survey was co-funded with the neighbouring Selby District Council (which 'shares' the site with York) whereas the Skipwith Common Survey was entirely funded by Selby given (a) its location within that authority and (b) the large distances from any proposals within York's Plan.

<sup>2</sup> *Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018*

<sup>3</sup> City of York Council Habitats Regulations Assessment of the Local Plan. AMEC Environment & Infrastructure UK limited. September 2014 (DRFAT).

<sup>4</sup> HRA of Plan Allocations. Habitats Regulations Assessment of City of York Council Local Plan. Waterman Infrastructure & Environment Limited. September 2017

<sup>5</sup> Habitats Regulations Assessment of City of York Council Local Plan. Waterman Infrastructure & Environment Limited. April 2018.



- 1.11. Defra guidance<sup>6</sup> (expanded in C12 of the Handbook<sup>7</sup>) allows competent authorities to reduce the duplication of effort by drawing on earlier conclusions where there has been no material change in circumstances. If there is any doubt, the allocation or policy is assessed normally. Consequently, this current HRA draws on the findings of both previous documents where possible but evaluates the Plan in the context of contemporary evidence and best practice.

## Habitats Regulations Assessment of Local Plans, Natura 2000 and European sites

- 1.12. Natura 2000 is the cornerstone of European nature conservation policy; it is an EU-wide network of Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. Together, the network comprises over 27,000 sites<sup>8</sup> and safeguards the most valuable and threatened habitats and species across Europe; it represents the largest, coordinated network of protected areas in the world.
- 1.13. In the UK, these sites are commonly referred to as 'European sites' which, according to Government policy<sup>9</sup>, also comprise 'Wetlands of International Importance', or Ramsar sites. Over 8.5% of the UK land area forms part of this network including, locally, sites such as Strensall Common, Skipwith Common, the Lower Derwent Valley and River Derwent. Further afield, it also incorporates such well known sites as the Yorkshire Dales and the North York Moors.
- 1.14. The Regulations employ a series of mandatory tests outlined in Fig 1 (derived from Circular 06/05).
- 1.15. In practical terms, experience gained from implementation of the process has encouraged the adoption of additional filters at the outset to explore if the plan even needs to be subject to HRA at all. This more sensible approach is laid out in Fig 2 where many of the component steps are given expression. It is the process described in Fig 2 that is followed in this HRA.
- 1.16. So, for example, the initial test adopted in this HRA (in Section 2) firstly explores if the plan can be excluded from the HRA simply because it is considered that it could not have any conceivable effect on a European site before exploring whether the plan is actually necessary for the management of a European site (in section 2 of this HRA).
- 1.17. If the plan cannot be ruled out at this stage, the competent authority (ie the Council) must then identify whether the plan is '... likely to have a significant effect on a European Site ... either alone or in combination with other plans or projects'. If significant effects are found to be absent or can be avoided, the plan may be adopted without further scrutiny.
- 1.18. An in-combination assessment is required where an impact is identified which would have an insignificant effect on its own ('a residual effect') but where likely significant effects arise cumulatively with other plans or projects. Together, these first few steps of Stage 1 (in Fig 2) are often referred to as 'Screening'.

<sup>6</sup> Habitats Directive – Guidance on competent authority coordination under the Habitats Regulations, Defra (July 2012).

<sup>7</sup> Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, November 2018 DTA Publications Ltd

<sup>8</sup> Natura 2000 Barometer

<https://view.officeapps.live.com/op/view.aspx?src=http://ec.europa.eu/environment/nature/natura2000/barometer/docs/Natura%202000%20barometer.xlsx> accessed 14 February 2019

<sup>9</sup> ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005)



Figure 1: Consideration of development proposals affecting European sites

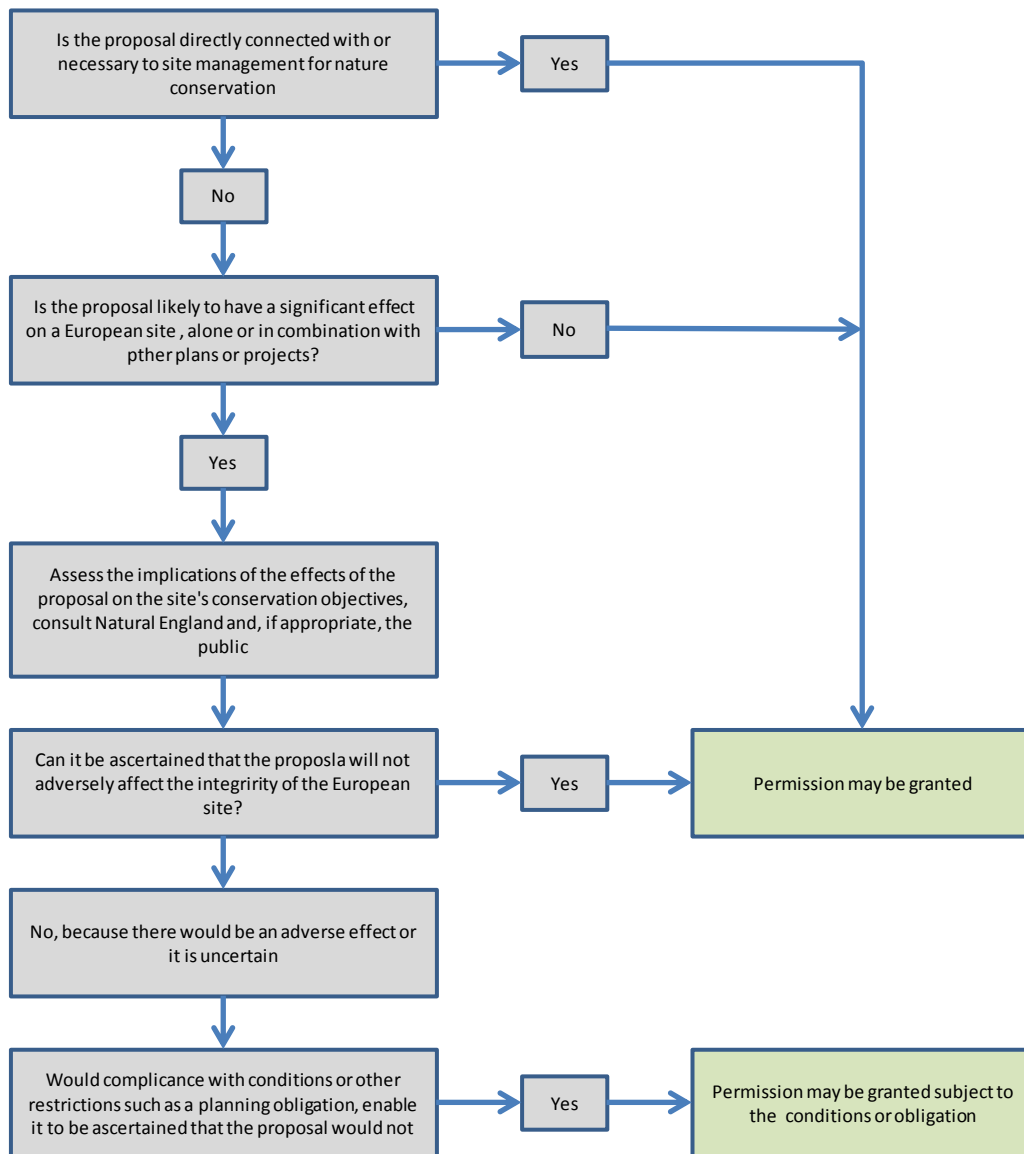
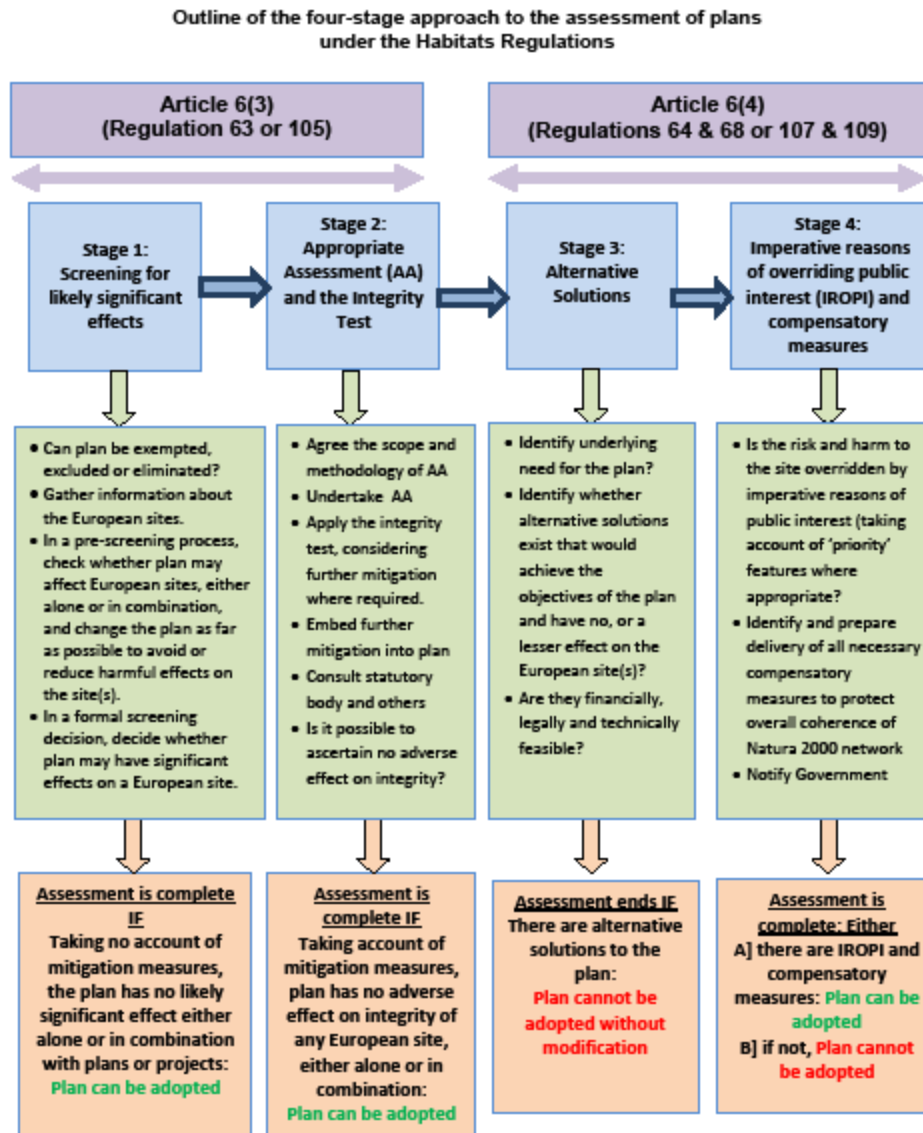






Figure 2: The four stage assessment of plans under the Habitats Regulations



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- 1.19. This HRA utilises guidance provided by the Habitats Regulations Assessment Handbook. The Handbook draws on best practice and case law at home and across the EU to identify over 180 principles that inform how HRA should be carried out. Subscribers to the Handbook include Natural England, the Environment Agency and the Planning Inspectorate which ensures that key decision-makers will be familiar with the approach shown in Fig 2.

## Definitions, Evidence, Precautionary Principle and Case Law

- 1.20. The specific meaning of the key terms and tests in HRA is of considerable importance. Drawing again on Section C.7 of the Handbook and other sources the following definitions, embedded in case law, apply to key words, phrases and stages throughout the overall process:

### Stage One - Screening

- *Likely* in the context of ‘a likely significant effect’ means a ‘a possible significant effect; one whose occurrence cannot be excluded on the basis of objective information’;<sup>10</sup>; therefore, ‘likely’ differs from the normal English meaning of a probability
  - *Significant*, in the same context, means ‘any effect that would undermine the conservation objectives for a European site ...’;<sup>11</sup>
  - *Objective*, in this context, means clear verifiable fact rather than subjective opinion. ...
  - *There should be credible evidence to show that there is a real rather than a hypothetical risk<sup>12</sup> of effects that could undermine the site’s conservation objectives. Any serious possibility of a risk that the conservation objectives might be undermined should trigger an ‘appropriate assessment’.*
- 1.21. In other words, this means the initial screening phase should not be exhaustive, a point candidly described by Advocate General Sharpston in paragraphs 49 and 50 of the Sweetman case<sup>13</sup> when describing the levels of scrutiny to be applied to each test as follows:
- ‘The threshold at the first stage [the test for LSE] ... is thus a very low one. It operates merely as a trigger, in order to determine whether an appropriate assessment must be undertaken ... The threshold at (the second) [the appropriate assessment] stage is noticeably higher than that laid down at the first stage. That is because the question (to use more simple terminology) is not ‘should we bother to check?’ (the question at the first stage) but rather ‘what will happen to the site if this plan or project goes ahead ...’.*
- 1.22. This was amplified in the Bagmoor Wind case<sup>14</sup> was similarly clear:
- ‘If the absence of risk ... can only be demonstrated after a detailed investigation, or expert opinion, that is an indicator that a risk exists and the authority must move from preliminary examination to appropriate assessment’.*
- 1.23. In other words, if there is any serious possibility of a risk that the conservation objectives might be undermined this should trigger an appropriate assessment.’

<sup>10</sup> European Court of Justice Case C – 127/02 *Waddenzee* 7 September 2004

<sup>11</sup> Peter Charles Boggis and Easton Bavants Conservation v Natural England and Waveney District Council, High Court of Justice Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061 20th October 2009

<sup>12</sup> Peter Charles Boggis and Easton Bavants Conservation v Natural England and Waveney District Council, High Court of Justice Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061 20th October 2009

<sup>13</sup> C-258/11 Sweetman reference for a preliminary ruling from the Supreme Court of Ireland. Opinion of the Advocate General 22 November 2012

<sup>14</sup> Bagmoor Wind Limited v The Scottish Ministers Court of Sessions [2012] CSIH 93



- 1.24. For the avoidance of doubt, *an in combination* assessment is required only where an impact is identified which would have an insignificant effect on its own (a residual effect) but where likely significant effects may arise cumulatively with other plans or projects.

## Stage Two – Appropriate Assessment and the Integrity Test

- 1.25. Fundamentally, the HRA process employs the precautionary principle and Regulation 105 ensures that where a plan is *'likely to have a significant effect'*, it can only be adopted if *the competent authority* can ascertain (following an *appropriate assessment*) that it *'will not adversely affect the integrity of the European site'*. In simpler terms, it is not for the competent authority to prove harm but for the plan proposer to demonstrate the absence of harm.

- 1.26. The *integrity* of a European site was described in para 20 of ODPM Circ. 06/2005 as:

*the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.*

- 1.27. Elsewhere, the CJEU (Sweetman)<sup>15</sup> defined integrity as:

*'the lasting preservation of the constitutive characteristics of the site ... whose preservation was the objective justifying the designation of that site*

- 1.28. Whilst the Supreme Court (Champion)<sup>16</sup> has found “appropriate” is not a technical term and indicates no more than that the assessment should be appropriate to the task in hand, it can be seen that when compared with the test at the screening stage for likely significant effect, the a *'appropriate assessment'* is more thorough.

## Stages Three and Four – The Derogations

- 1.29. If an adverse effect on the integrity of the site can be avoided, the plan can be adopted (Fig 1). If not, derogations would have to be sought to allow the plan to continue; these are regarded as a last resort and considered only in exceptional circumstances. These explore whether *alternative solutions* are possible and if there are not, whether *imperative reasons of overriding public interest* apply and if so, whether compensation is feasible. These latter stages are not shown in Fig 1 but the entire process is summarised in Stages 2, 3 & 4 of Fig 2.

## Overall approach

- 1.30. The HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK<sup>17</sup>. However, the judgement<sup>18</sup> recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the UK High Court (Feeney<sup>19</sup>) which stated:

*“Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits”.*

- 1.31. This is where a way has to be found that whilst mindful of the need for the precautionary principle to be applied, the HRA must strive to identify only those plausible effects and not the extremely unlikely.

<sup>15</sup> Sweetman EU:C:2013:220 para 39

<sup>16</sup> R (on the application of Champion) v. North Norfolk District Council [2015] UKSC 52.

<sup>17</sup> Case C-6/04: Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland judgment of the Court 20 October 2005.

<sup>18</sup> Opinion of advocate general Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

<sup>19</sup> Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin



- 1.32. Because this is a strategic plan, the ‘*objective information*’<sup>20</sup> required by the HRA is typically only available at a strategic or high level, without the detail that might be expected at the planning application stage.

### Mitigation and recent case law

- 1.33. Recently, the European Court of Justice gave its ruling on the People Over Wind<sup>21</sup> case which provided a new interpretation of when and how mitigation measures should be considered in an HRA. In departing from previous decisions, it clearly identifies that measures designed specifically to avoid or reduce likely significant effects should not be evaluated at the screening stage but reserved for the appropriate assessment. The implications of this recent judgment are still to be fully understood, in circumstances where the plan which the specific subject of consideration under the Directive and Regulations itself includes policies which provide for mitigation, but for the avoidance of doubt this HRA takes full account of this ruling by restricting consideration of any mitigation measures to the appropriate assessment.

### Evidence

- 1.34. The owner of land affected by Policies SS19/ST35, H59 and E18 at Strensall, DIO, has produced two Shadow HRAs (December 2017)<sup>22 23</sup> to inform their aspirations. Some evidence provided by the DIO has been taken into account in this HRA, where appropriate, but it should be noted that the DIO evaluated a ‘larger’ scheme and the Council has not accepted some of its conclusions.
- 1.35. Also landowners affected by Policies SS13/ST15 have independently produced ecological information in support of their proposals and this is taken account of in the evaluation of those policies.

### Brexit

- 1.36. The requirement for this HRA is embedded in the European Union’s Habitats Directive and so the decision to leave the EU potentially throws doubt on the need for the HRA of this and other local plans. However, UK law and policy is currently unchanged and the need for HRA remains. The HRA of the Council’s Local Plan will therefore continue and the recommendations will be acted upon until such time as Government indicates otherwise.

### Role of the competent authority

- 1.37. Lastly, although this HRA has been prepared to help the Council discharge its duties under the Habitats Regulations, the Council is the competent authority and it must decide whether to adopt this report or otherwise.

<sup>20</sup> European Court of Justice Case C – 127/02 *Waddenzee* 7 September 2004

<sup>21</sup> [Case C/323-17 People Over Wind](#)

<sup>22</sup> Amec Foster Wheeler Environment & Infrastructure Limited. December 2017. DIO York Sites: Queen Elizabeth Barracks (QEB). Information to support a Habitats Regulations Assessment.

<sup>23 23</sup> Amec Foster Wheeler Environment & Infrastructure Limited. December 2017. DIO York Sites: Towthorpe Lines. Information to support a Habitats Regulations Assessment.



## 2. THE NEED FOR ASSESSMENT AND IDENTIFYING EUROPEAN SITES AT RISK

### Exclusion, Elimination and Exemption from the need for Assessment

- 2.1. Prior to the identification of vulnerable European sites, Stage 1 of Fig.2 (elaborated in F3.2 – F3.4 of the Handbook) encourages a brief review of the plan to explore if it can be:
- **Excluded** from the HRA because 'it is not a plan within the meaning and scope of the Habitats Directive', or
  - **Eliminated** from the HRA because it can easily be shown that although 'it is a plan ... it could not have any conceivable effect on any European site', or
  - **Exempted** from the HRA because it is '... directly connected with or necessary to the management of the ... European site' (ie the first formal stage of the HRA - Fig 1).
- 2.2. Taking these in turn, **it is clear the Local Plan represents a real plan with the potential to harm European sites and so can neither be excluded nor eliminated from the HRA. Likewise, the purpose of the Plan is not the nature conservation management of any European sites and so it cannot be made exempt from further assessment.** Consequently, the next steps in Stage 1 of Fig 2 need to be pursued by identifying which European sites and which features may be vulnerable as follows.

### Identification of European sites at risk

- 2.3. To encourage a consistent, reliable and repeatable process, the *Handbook* (Figure F4.4) identifies 16 generic criteria, listed below in Table 1 (Columns 1 & 2), that when evaluated generate a precautionary, 'long' list of European sites in Column 3 which might be affected by the Plan<sup>24</sup>. However, when considered further, using readily available information and local knowledge (Column 4) the list of plausible threats can be refined and the list of affected sites reduced (Column 5). Albeit a coarse filter, this enables the exercise to comply with the Boggis case and attempts to only consider realistic and credible threats whilst avoiding the hypothetical or extremely unlikely.
- 2.4. If Column 5 remains empty of European sites, following the tests in Column 2, then no European sites will be considered to be at risk and no further scrutiny will be required. Note that sites identified against the first criterion (ie '1. All plans') should be ignored as this is simply a list of European sites within the City Council's boundary.
- 2.5. The search was restricted to those European sites found within 20km of the district boundary as this was considered to be the maximum extent that policies and allocations could seriously be considered to generate measurable effects. This focuses the attention of this HRA on the River Derwent, Lower Derwent Valley and Strensall Common European sites, which are all found within the Council boundary and, Kirk Deighton, Skipwith Common, the Thorne and Hatfield Moor complex and the Humber Estuary which are all found in neighbouring local authorities.
- 2.6. It is important to note that although the outcomes of this site identification task will reflect the type and location of activities proposed within the plan and/or the ecological characteristics of the European sites, it does not represent the test for likely significant effect (which follows later).

<sup>24</sup> This table is taken from the Handbook albeit with changes to the number and titles of Columns appropriate to this HRA.

**Table 1: Potential mechanisms and the initial list of European sites that could be affected**

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
1. All plans (terrestrial, coastal and marine)	Sites within the geographic area covered by or intended to be relevant to the plan	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Strensall Common (SAC)	This 'test' simply identifies all the European sites in the Council's geographic area. All sites present will be included.	Lower Derwent Valley River Derwent Strensall Common
	Sites upstream or downstream of the plan area in the case of river or estuary sites	Humber Estuary (SPA, SAC, Ramsar) Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC)	Effects considered are those associated with the physical presence of built development and the <i>localised</i> effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc. No development is proposed that could lead to such effects in the vicinity of any of the three European sites. Therefore, <b>effects on the aquatic environment of the Humber Estuary, the Lower Derwent Valley and the River Derwent can be ruled out and are removed from further consideration.</b> Note that the <i>indirect</i> effects of changes to wastewater disposal are assessed separately under '7b'.	None
2. Plans that could affect the aquatic environment	Open water, peatland, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area	Skipwith Common (SAC) Strensall Common (SAC)	Effects considered are those associated with the physical presence of built development and the <i>localised</i> effects on surface/groundwater resources and quality, resulting from changes in run-off, sedimentation, erosion etc. No development is proposed that could lead to such effects in the vicinity of Skipwith Common.	Strensall Common



Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
3. Plans that could affect the marine environment	Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species	Humber Estuary (SPA, SAC, Ramsar)	<p>Therefore, <b>effects on the aquatic environment of Skipwith Common can be ruled out and are removed from further consideration.</b></p> <p>However, this may not be the case at Strensall Common where development immediately adjacent to this wetland site is proposed. Consequently, adverse effects cannot be ruled out here and so <b>Strensall Common will remain in the assessment.</b></p> <p>Note that the <i>indirect</i> effects of changes to wastewater disposal are assessed separately under '7b'.</p> <p>Given the distance and lack of public access to the closest parts of the Upper Estuary, it is considered almost inconceivable that any aspect of the Plan could affect any of the physical and biological processes/features of the Humber Estuary. Consequently, <b>effects on the marine environment on the Humber Estuary are removed from any further consideration in this HRA.</b></p>	None
4. Plans that could affect the coast	Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes	None	N/A	None









Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
7. Plans that would increase the amount of development	<p>(c) Such European sites within an agreed zone of influence or other evidence-based longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations</p> <p>(a) Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the</p>	<p>Peak District SPA and SAC Yorkshire Dales SPA and SAC Flamborough Head SPA</p> <p>Kirk Deighton SAC Lower Derwent Valley (SPA, SAC, Ramsar)</p>	<p>numbers would be low, but they are likely to be well managed and the sites (and associated mobile species) would be resilient to change brought about by this Plan. Therefore, effects of recreational pressure on the <b>Thorne and Hatfield Moor sites are removed from any further consideration in this HRA.</b></p> <p>Impacts from recreational pressure on the Humber Estuary and Skipwith Common cannot be ruled out at this stage and so remain in the HRA for further consideration.</p> <p>The sites of the Peak District, Yorkshire Dales, and Flamborough Head etc are considered too distant to be affected by any credible threats <b>and are removed from any further consideration in this HRA.</b></p> <p>The HRA of Yorkshire Water's Water Resources Management Plan found that there were unlikely to be any significant effects on European sites, either alone or in combination with other plans or</p>	<p>None</p> <p>None</p>



Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
7. Plans that would increase the amount of development	plan area	River Derwent (SAC) Skipwith Common SAC Strensall Common (SAC)	projects <sup>25</sup> . <b>All potentially affected sites can therefore be ruled out from further scrutiny.</b>	
	(b) Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area	Humber Estuary (SAC, Ramsar) Lower Derwent Valley (SAC, Ramsar) River Derwent (SAC)	Yorkshire Water has a legal duty to provide wastewater treatment for new dwellings. Policy GI2 (vii) effectively relates the construction of new development to the availability of capacity at wastewater treatment works across the area. Consequently, adverse effects on the receiving water bodies from the anticipated increase in wastewater disposal can be ruled out of this HRA with no residual effects. <b>All potentially affected sites can be removed from further scrutiny.</b>	None
	(c) Sites that could be affected by the provision of new or extended transport or other infrastructure	None	No such infrastructure proposed	None
	(d) Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Skipwith Common (SAC) Strensall Common (SAC)	Adverse impacts from increased air pollution can be possible on sites found within 200m of roads. Components of all four listed European sites are situated within this limit and so all are retained for further assessment; features that could be particularly vulnerable include heathlands at Strensall and Skipwith, and the grasslands and invertebrate communities of the River Derwent/Lower Derwent Valley complex	Lower Derwent Valley River Derwent Skipwith Common Strensall Common
8 Plans for linear developments or	Sites within a specified distance from the centre line of the	None	No such infrastructure proposed	None

<sup>25</sup> Water Resource Management Plan 2014 Strategic Environmental Assessment Post Adoption Statement Cascade/Yorkshire Water



Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
infrastructure	proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to be agreed by the statutory nature conservation body			
9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan	None	No such activities proposed	None
10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan	None	No such activities proposed	None
11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil	Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan	None	No such activities proposed	None



Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
12. Plans that could change the quantity, volume, timing, rate, or other characteristics of biological resources harvested, extracted or consumed	Sites whose qualifying features include the biological resources which the plan may affect, or whose qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption	None	No such activities proposed	None
13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed	Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption	None	No such activities proposed	None
14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species	Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Thorne & Hatfield Moors (SPA) Humber Estuary (SPA, SAC, Ramsar) Kirk Deighton (SAC)	For the purposes of this HRA, it is considered that the effects of this category will be captured effectively via the application of criteria 5 (mobile species) and/or 6 (recreation).  Therefore, this criterion is screened out to avoid duplication and so <b>impacts resulting from 'Disturbance' will be removed from further consideration in this HRA on all five European sites listed.</b>	None



Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	European sites selected
15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution	Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan	None	No such activities proposed	None
16. Plans which could introduce or increase a potential cause of mortality of species	Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan	None	No such activities proposed	None

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- 2.7. The outputs of the review carried out in Table 1 rule out the possibility of any credible effects from any aspect of the Plan on Kirk Deighton SAC, Thorne Moor SAC, Hatfield Moor SAC and Thorne & Hatfield Moors SPA. These sites will therefore be ruled out of any further scrutiny in this HRA s.
- 2.8. In addition, the exercise reduces the number of factors at play and begins to clarify the nature of potential impacts. Importantly, it confirms that the focus of this HRA should be restricted to only the following European sites and issues:

European sites	Feature
(2) Aquatic environment	Strensall Common SAC
(5) Mobile species	Humber Estuary SPA, SAC and Ramsar Lower Derwent Valley SPA, SAC and Ramsar River Derwent SAC
(6) Recreational pressure	Humber Estuary SPA and Ramsar Lower Derwent Valley SPA, SAC and Ramsar River Derwent Skipwith Common SAC Strensall Common SAC
(7d) Airborne pollution	Lower Derwent Valley SPA, SAC and Ramsar River Derwent SAC Skipwith Common SAC Strensall Common SAC

- 2.10. The net result, and benefit to the HRA, is that the list of issues and sites potentially affected is reduced, making for a shorter and more focused HRA than would otherwise be the case.
- 2.11. However, as impacts on a number of European sites cannot be ruled out, further ecological information needs to be gathered to inform subsequent tests in the HRA. Drawing on the citations, conservation objectives, supplementary advice (where published) and site improvement plans, all five European sites that remain at risk are described in Table 2 and are accompanied by observations on their sensitivity to external factors – the latter informed by Table 1. Conservation objectives and threats and pressures extracted from the SIP are provided in full. Citation and qualifying features are provided in Appendix A.
- 2.12. For ease of access, references that influence Table 2 inform much of the rest of the HRA are listed immediately below.

## References

### **Lower Derwent Valley SPA, SAC, Ramsar**

Lower Derwent Valley SPA Citation. 1993

Conservation Objectives for Lower Derwent Valley SPA. 30 June 2014. (Version 2)

Draft Supplementary advice on conserving and restoring features. Lower Derwent Valley SPA. 25 January 2019

Lower Derwent Valley SAC Citation. 14 June 2005




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Conservation Objectives for Lower Derwent Valley SAC. 27 November 2018. (Version 3)

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Draft Supplementary advice on conserving and restoring features. Lower Derwent Valley SAC. 29 June 2016

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Site Improvement Plan. Lower Derwent Valley. 6 October 2014. V1.0

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Ramsar Information Sheet Lower Derwent Valley SAC Citation. 8 June 1993

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**River Derwent SAC**

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River Derwent SAC Citation. 14 June 2005

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Conservation Objectives for River Derwent SAC. 27 November 2018. (Version 3)

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Draft Supplementary advice on conserving and restoring features. River Derwent SAC. 27 March 2017 (Version 2)

---

River Derwent SAC Site Improvement Plan. Natural England. V1.0. 8 October 2014.

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**Skipwith Common SAC**

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Skipwith Common SAC Citation. 14 June 2005

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Conservation Objectives for Skipwith Common SAC. 27 November 2018. (Version 3)

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Draft Supplementary advice on conserving and restoring features. Skipwith Common SAC. 25 January 2019

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Skipwith Common Site Improvement Plan, Natural England, v1.0, 18 December 2014

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**Strensall Common SAC**

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Strensall Common SAC Citation. 14 June 2005

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Conservation Objectives for Strensall Common SAC. 27 November 2018. (Version 3)

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Draft Supplementary advice on conserving and restoring features. Strensall Common SAC. 25 January 2019

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Strensall Common Site Improvement Plan, Natural England, v1.0, 18 December 2014

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**Humber Estuary SPA, SAC, Ramsar**

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Humber Estuary SPA Citation. 31 August 2007

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Conservation Objectives for Humber Estuary SPA. 30 June 2014. (Version 3)

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Humber Estuary SAC Citation. 10 December 2009

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Conservation Objectives for Humber Estuary SAC. 27 November 201. (Version 3)

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Humber Estuary Site Improvement Plan, Natural England, v1.1. 8 July 2015

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Humber Estuary Ramsar Information Sheet. 31 August 2007

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Table 2: Description of European Sites

Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
<b>Lower Derwent Valley SPA, SAC, Ramsar</b>		
<p>The Lower Derwent Valley (LDV) supports the largest single expanse of wet, neutral (MG4) hay meadow in the UK. The site also hosts alder woodland and internationally important populations of breeding and wintering waterbirds. The habitats are reliant in part on the maintenance of a favourable hydrological regime, including periodic inundation, whilst mobile species remain susceptible to development, public pressure and disturbance both on and off the site on functionally-linked land outside the designated site, sometimes several kilometres distant. In common with the River Derwent SAC, the qualifying features include otter which is similarly vulnerable.</p> <p>The Ramsar designation adds wetland invertebrates, passage birds, ruff and whimbrel. Most of the site is privately owned and farmed with limited public access but all is managed for nature conservation with Natural England, including the LDV National Nature Reserve. Limited car parking and a formal arrangement of paths and hides effectively reduces the impact of existing recreational pressure although some 'informal' access or trespass occurs. Despite this, the site is relatively robust but large increases in visitors may be difficult to accommodate without adequate mitigation.</p> <p>The grassland and water bodies remain vulnerable to nutrient enrichment - the addition of inorganic nitrogen fertiliser is not allowed - but birds and mammals are more resilient.</p> <p>There are five component SSSIs. All of Derwent Ings SSSI to be in 'favourable' or 'unfavourable recovering' condition. 99.2% of the River Derwent SSSI is 'favourable' or 'unfavourable recovering'; 0.8% is 'unfavourable no change' but the threat level is 'high' across a wider area. All Newton Mask SSSI, Brighton Meadows SSSI and Melbourne and Thornton Ings SSSI are in favourable condition but carry a range of threats.</p> <p>For the avoidance of doubt, the Ramsar site encompasses a similar area to the SPA but excludes the river (ie the River Derwent SAC). Given the overlap between the majority of Ramsar and SPA/SAC features, this HRA will restrict assessment to just the latter to reduce repetition. However, the 'unique' wetland invertebrate assemblage of the Ramsar site is not reflected in the corresponding SAC.</p> <p>This assemblage forms an integral component of the grassland, wetland and woodland complex of the Lower Derwent Valley and it is considered that the assessment of impacts on this group is fundamentally linked to those of its supporting habitats. Therefore, it is not assessed independently and instead, reflecting the ecology of the species and habitats, an approach based on the evaluation of just the SPA and SAC features is considered adequate to embrace this feature. This approach is given weight by the fact that as a Ramsar feature it does not benefit from bespoke conservation objectives not is it considered in Natural England's SIP or its supplementary advice.</p>	<p><b>SPA</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p> <p><b>SAC</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species;</p> <p>The structure and function (including typical species) of qualifying natural habitats;</p> <p>The structure and function of the habitats of qualifying species;</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>	<ol style="list-style-type: none"> <li>1. Hydrological changes (P);</li> <li>2. Drainage (P);</li> <li>3. Public access/Disturbance (T);</li> <li>4. Invasive species (T);</li> <li>5. Undergrazing (T);</li> <li>6. Inappropriate scrub control (T);</li> <li>7. Air pollution; impact of atmospheric nitrogen deposition (T);</li> <li>8. Invasive species (Himalayan balsam) (T);</li> <li>9. Invasive species (others) (T)</li> </ol>





Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
<p><b>River Derwent SAC</b></p> <p>The River Derwent represents one of the best examples in England of a lowland river stretching from Ryemouth in the north to its confluence with the Ouse in the south of the District – a small section lies within the Lower Derwent Valley National Nature Reserve. It supports diverse communities of flora and fauna, notably floating vegetation dominated by water crowfoot; and river lamprey, sea lamprey, bullhead and otter. The mobile species utilise extensive stretches of water both upstream and downstream throughout the catchment beyond the boundaries of the SAC, and are critically dependent on the maintenance of a favourable hydrological (including physical and chemical) conditions throughout their range and so are vulnerable to pollution events and the creation of physical or chemical barriers; lamprey migrate to the open sea via the Derwent, Ouse and Humber Estuary providing an intimate link between both sites. The Derwent is meso/eutrophic and carries a high nutrient load providing a degree of resilience against air pollution, and whilst otter can be considered resilient, the floating vegetation communities and fish populations may be vulnerable. Overall, the site can be considered relatively robust but vulnerable to changes in water quality (especially inputs of phosphate) from wastewater disposal, for instance.</p> <p>Limited car parking and a formal arrangement of footpaths reduces the impact of existing recreational pressure (although informal access or trespass also occurs, although this is regarded to be limited to local residents) and the simple width of the channel reduces direct impacts. So, whilst bullhead and lamprey can be considered immune to such pressure, otter and the floating vegetation community may not be.</p> <p>There are two component SSSIs – the River Derwent and Newton Mask. Natural England has assessed 99.2% of the River Derwent SSSI to be in 'favourable' or 'unfavourable recovering' condition; 0.4% is 'unfavourable no change' but the threat level is considered to be 'high' across a much wider area. All of Newton Mask SSSI is considered to be in favourable condition but carries a 'medium' threat level.</p> <p>For the avoidance of doubt, the Lower Derwent Ramsar site encompasses a similar area to the SPA but excludes the River Derwent SAC.</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species;</p> <p>The structure and function (including typical species) of qualifying natural habitat;</p> <p>The structure and function of the habitats of qualifying species;</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p>	<ol style="list-style-type: none"> <li>1. Physical modification (P/T);</li> <li>2. Water pollution (T);</li> <li>3. Invasive species (T);</li> <li>4. Change in land management (T);</li> <li>5. Water abstraction (T).</li> </ol>



Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
<b>Skipwith Common SAC</b>		
<p>Skipwith Common supports extensive areas of both wet and dry heath, with rush pasture, mire, reedbed, open water and woodland. The entire European site is managed as a National Nature Reserve by Natural England, grazed with cattle and sheep and has been dedicated as open access land under CRoW. The number of visitors is thought to be increasing causing some erosion and disturbance of grazing animals, and the heathland could be vulnerable to nitrogen deposition. The site remains both fragile and vulnerable.</p> <p>The underpinning Skipwith Common SSSI was assessed by Natural England to be in 'favourable' or 'unfavourable recovering' condition. The corresponding SIP for the European site identifies, <i>inter alia</i>, a number of threats including public pressure, air pollution and drainage.</p>	<p>H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i>; wet heathland with cross-leaved heath (or 'wet heath');</p> <p>H4030. European dry heaths (or 'dry heath').</p>	<ol style="list-style-type: none"> <li>1. Public access/Disturbance (P);</li> <li>2. Inappropriate scrub control (T);</li> <li>3. Drainage (T);</li> <li>4. Air pollution: impact of atmospheric nitrogen deposition (P).</li> </ol>
<b>Strensall Common SAC</b>		
<p>Strensall Common is managed in part by the Yorkshire Wildlife Trust and MOD, and, at over 570ha, supports one of the largest areas of lowland heath in northern England. Extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands/scrub and ponds. Grazing, by sheep and cattle is the key management tool with stock typically present during summer and autumn.</p> <p>Vulnerable to nitrogen deposition, it is also subject to considerable visitor pressure although an established network of paths reduces trampling pressure; regular closures of much of the heath by the MOD to allow safe operation of the adjacent firing ranges also helps reduce the intensity of this threat. However, both the dry and wet heath habitats are particularly vulnerable, not only to erosion etc, but also changes to the local hydrological regime and so construction proposed nearby will require careful scrutiny.</p> <p>The entire, underpinning SSSI was considered by Natural England in 2011 to be in favourable or unfavourable-recovering condition. However, the corresponding SIP identifies a number of threats including, <i>inter alia</i>, public pressure and air pollution. The draft Supplementary Advice, recently published by Natural England (February 2019) highlights the threat posed to the maintenance of the grazing regime by the worrying and subsequent disturbance of livestock by dogs. It states:</p> <p><i>'any activity (sic) threatened the viability of this management could pose a risk to heathland habitat'.</i></p>	<p>H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i>; wet heathland with cross-leaved heath;</p> <p>H4030. European dry heaths.</p>	<ol style="list-style-type: none"> <li>1. Public access/Disturbance (P);</li> <li>2. Inappropriate scrub control (T);</li> <li>3. Air pollution: impact of atmospheric nitrogen deposition (P).</li> </ol>



Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
<p><b>Humber Estuary SAC, SPA &amp; Ramsar</b></p> <p>The Humber Estuary carries a high suspended sediment load which sustains a dynamic system of intertidal and subtidal mudflats, sandflats, saltmarsh and reedbeds extending to around 37,000ha. Other notable habitats include sand dunes, coastal lagoons and sub-tidal sandbanks. Qualifying (mobile) species include river and sea lamprey which migrate through the estuary to rivers in the Humber catchment.</p> <p>Importantly, the estuary regularly supports around 150,000 wintering and passage waterbirds. At high tide, large mixed flocks congregate in key roost sites often beyond the European site boundary due to the combined effects of extensive land claim, coastal squeeze and lack of grazing marsh and grassland on both banks of the estuary. In summer, the site supports important breeding populations of Bittern, Marsh harrier, Avocet and Little tern. All could be vulnerable to development or recreational pressure on functionally-linked land.</p> <p>Natural England has assessed 99% of the underpinning Humber Estuary SSSI to be in 'favourable' or 'unfavourable recovering' condition. Only 1% of the site is assessed to be in 'unfavourable no change' or 'unfavourable declining' condition. However, the 'threat' level is considered to be 'medium' or 'high' across a much wider area.</p> <p>The corresponding SIP for the European site identifies, <i>inter alia</i>, a number of threats including water pollution and public pressure.</p> <p>Whilst therefore potentially vulnerable to a wide range of factors, its size, considerable distance from any point sources within the Council area and relative robustness of many of the features make the likelihood of harmful effects remote.</p> <p>The one possible exception to this is the population of lamprey which migrate from the sea, via the Humber to breeding grounds in the River Derwent. Physical or chemical barriers to migration may cause harm and so factors like wastewater disposal can require careful scrutiny if not addressed effectively in policy terms. Similarly, grey seals could also be vulnerable to similar factors.</p> <p>Given the similarity between Ramsar and SPA/SAC features, this HRA will restrict assessment to just the latter to avoid repetition.</p>	<p><b>SPA objectives</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and,</p> <p>The distribution of the qualifying features within the site.</p> <p><b>SAC objectives</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species;</p> <p>The structure and function (including typical species) of qualifying natural habitats;</p> <p>The structure and function of the habitats of qualifying species;</p> <p>The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</p> <p>The populations of qualifying species; and,</p> <p>The distribution of qualifying species within the site.</p>	<ol style="list-style-type: none"> <li>1. Water pollution (P/T);</li> <li>2. Coastal squeeze (T);</li> <li>3. Changes in species distributions (T);</li> <li>4. Undergrazing (P);</li> <li>5. Invasive species (T);</li> <li>6. Natural changes to site conditions (P/T);</li> <li>7. Public access/Disturbance (P);</li> <li>8. Fisheries: Fish stocking; (P)</li> <li>9. Fisheries: Commercial marine and estuarine (P);</li> <li>10. Fisheries: Commercial marine and estuarine (T);</li> <li>11. Direct and take from development (T);</li> <li>12. Air pollution: impact of atmospheric nitrogen deposition (P);</li> <li>13. Shooting/scaring (P);</li> <li>14. Direct impact from third party (T);</li> <li>15. Inappropriate scrub control (P)</li> </ol>



2.13. The outputs of Table 1 allow this HRA to focus solely on a restricted number of possible impacts on five European sites: the Humber Estuary, Lower Derwent Valley, the River Derwent and both Skipwith and Strensall Commons. However, by drawing on the additional information provided in Table 2, the HRA is able to further refine the possible impacts to specific features, habitats and species. These, the key issues for the next, formal stage of this screening exercise are presented in Table 3.

**Table 3: Summarised, initial list of European sites, affected features and potential effects**

European site	Potential effects	Qualifying features at risk
Lower Derwent Valley SPA, SAC & Ramsar	(5) Impacts on mobile species	Breeding, non-breeding birds and otter
	(6) Impacts from recreational pressure	All habitats Breeding, non-breeding birds and otter
	(7d) Impacts from air pollution	All habitats
River Derwent SAC	(5) Impacts on mobile species	Otter, bullhead and lamprey
	(6) Impacts from recreational pressure	Otter Floating vegetation dominated by water crowfoot
	(7d) Impacts from air pollution	Floating vegetation dominated by water crowfoot River and sea lamprey, and bullhead
Skipwith Common SAC	(6) Impacts from recreational pressure	Wet heath and Dry heath
	(7d) Impacts from air pollution	Wet heath and Dry heath
Strensall Common SAC	(2) Impacts on the aquatic environment	Wet heath and Dry heath
	(6) Impacts from recreational pressure	Wet heath and Dry heath
	(7d) Impacts from air pollution	Wet heath and Dry heath
Humber Estuary SAC, SPA, Ramsar	(5) Impacts on mobile species	River and sea lamprey, grey seal and both breeding and non-breeding birds
	(6) Impacts from recreational pressure	Breeding and non-breeding birds

2.14. It is important to reiterate comments embedded in Table 2, regarding the assessment of Ramsar site features. The Humber Estuary Ramsar features are effectively duplicated by the SPA/SAC features. There is, therefore, no need for separate assessment and so further assessment in this HRA will focus entirely on the latter unless outcomes demand otherwise.

2.15. Whilst the same is true for the Lower Derwent Valley Ramsar and SPA bird communities, the relationship is not always so convenient. For instance, the wetland invertebrate assemblage in the Lower Derwent Valley Ramsar site is not represented in the corresponding SAC. However, there are strong reasons suggest that that assessment of the SAC habitats would be adequate to provide the necessary scrutiny to safeguard this assemblage.

2.16. This assemblage forms an integral component of the grassland, wetland and woodland complex of the Lower Derwent Valley and it is considered that the assessment of impacts on this group is fundamentally linked to those of its supporting habitats. Therefore, the wetland invertebrate



assemblage it is not assessed independently and instead, reflecting the ecology of the species and habitats, an approach based on the evaluation of just the SPA and SAC features is considered adequate to safeguard this feature and deliver the necessary scrutiny of Ramsar sites as required by current Government policy. Therefore, there will no specific reference to Ramsar features in the following screening exercise unless it is required for clarity.



### 3. SCREENING THE POLICIES – PROCESS AND OUTCOMES

#### Methodology

- 3.1. Section 2 of this HRA confirmed that the Local Plan could not be excluded from scrutiny and identified which European sites and which features might be affected by it. Again, by drawing on the Handbook, the next step, encompassing the second formal test from Fig 1, is to identify if there is a credible risk that a proposal in the Local Plan may lead to a LSE on a European site (by threatening to undermine its conservation objectives). It achieves this by evaluating the proposals in the plan against the following criteria to see if they are:
- **Screened out from further scrutiny** (because the individual policies or allocations are considered not 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects');
  - **Screened in for further scrutiny** (because the individual policies or allocations are considered 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects').
- 3.2. Mindful of the People Over Wind decision, section 6.3 of the Handbook describes a list of 'screening categories' (summarised in Table 4 below, itself adapted from an earlier edition of the Handbook) designed to evaluate both policy and site-based allocations to provide a rigorous and transparent approach to the screening process. Importantly, this process helps to provide a distinction between the *essential features and characteristics*, and *mitigation measures* of the Plan where relevant.

**Table 4: Screening Categories**

Code	Category	Outcome
A	General statement of policy/general aspiration	Screened out
B	Policy listing general criteria for testing the acceptability/sustainability of the plan	Screened out
C	Proposal referred to but not proposed by the plan	Screened out
D	Environmental protection/site safeguarding policy	Screened out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screened out
F	Policy that cannot lead to development or other change	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	Screened out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects (used when the location of a policy or allocation is unspecified)	Screened out
I	Policy or proposal with a likely significant effect on a site alone	Screened in
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination	Check



Code	Category	Outcome
K	Policy or proposal unlikely to have a significant effect either alone or in combination (screened out after the in combination test)	Check
L	Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test)	Check

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- 3.3. The impact of each potential effect is evaluated against the conservation objectives (Appendix A) of the relevant features of the European sites (Table 3) and categorised according to criteria in Table 4 for every policy and/or allocation in the Plan. This provides a bespoke screening opinion for each and every policy and/or allocation in the Plan. The outcomes are summarised in Tables 5 and 6 but given the large number of policies and allocations, the preliminary screening outcome for each policy and allocation is only presented in Appendix B. Where there is a risk of a likely significant effect alone and in combination, the issue will be categorised as Category I for simplicity but any in combination issues will still be considered below if necessary.
- 3.4. Issues of particular importance, arranged by potential effect, which influenced the outcome of this exercise, are discussed below taking each issue in turn.

## Screening

### Potential Effect – Aquatic environment

European site	Feature
Strensall Common SAC	Wet heath and Dry heath

#### Context

- 3.5. This potential effect is concerned with built development and its localised effects on surface and sub-surface flows both in terms of water quality and water resources resulting from changes in run-off, sedimentation, erosion etc. Table 3 shows that both the wet heath and dry heath communities of Strensall Common could be affected but as this criterion is restricted to localised threats, only three policies/allocations required evaluation.
- 3.6. The Council proposes development at three locations immediately adjacent or in close proximity to the Strensall Common European site (Policies SS19/ST35, E18 and H59). Together these comprise the development of 545 dwellings (500 under SS19/ST35 and 45 under H59) and a 4ha employment area. Despite supporting extensive areas of wet heath, a threatened habitat with a restricted distribution in the UK and beyond, changes to the hydrological regime are not identified as a key pressure or threat in the Strensall Common SIP (Table 1).

#### Screening opinions

##### Strensall Common

- 3.7. Wet and dry heath is found in the vicinity of all three proposed policies/allocations and extends across much of the European site. It is a fragile habitat, vulnerable to changes in the local surface or sub-surface hydrological regime. It is anticipated that construction of the proposed development, across all three allocations would be prolonged, extending over several years and





- would comprise substantial earthworks, the installation of drains and the storage of fuel and other potential contaminants, all with the potential to adversely affect the local hydrological regime.
- 3.8. Whilst it is not suggested that impacts from construction will adversely affect the entire site, it is possible that changes to drainage patterns could extend across localised but significant areas of the SAC. This would conflict with the conservation objective for Strensall Common to '*maintain ... the extent and distribution ... the structure and function ... and the supporting processes ... of the qualifying natural habitats ...*'
  - 3.9. Whilst Policies H59 and E18 do not provide for any mitigation, the same cannot be said for SS19/ST35 which suggests measures are required to manage hydrological effects. The latter cannot be regarded as embedded characteristics of the policy and must therefore be subjected to further scrutiny via an appropriate assessment.
  - 3.10. Given the interrelationship between all three policies, all three will be subject to this further scrutiny, despite their differing approaches to mitigation.

**Therefore, there is a risk that the proposals contained within Policies SS19/ST35, E18 and H59 could undermine the conservation objectives of the heathland features of Strensall Common SAC and that a likely significant effect cannot be ruled out (alone). Consequently, the policies must be screened in (Category I) and an appropriate assessment is required.** Each policy is capable of resulting in a likely significant effect alone and, therefore, no residual effects are anticipated and there is no need for an in combination assessment at this stage.

## Potential Effect – Mobile Species

European sites	Feature
Lower Derwent Valley SPA and SAC	Breeding and non-breeding birds, and otter
River Derwent SAC	Otter, bullhead and lamprey
Humber Estuary SPA, SAC and Ramsar	Lamprey, grey seals and both breeding and non-breeding birds

### Context

- 3.11. Mobile Species are defined here as those that utilise ('functionally-linked') land or water beyond the European site boundary for some part of their life-cycle be it seasonally, diurnally or even intermittently. Consequently, they are vulnerable to a range of both localised and strategic effects away from protected areas. Therefore, in the case of fish and otter, effects on water quality and resources will have to be considered both up and downstream, and, in terms of bird populations, attention will have to be paid to land-take or disturbance on potentially wide areas of land.
- 3.12. Table 3 shows that a number of mobile species across three European sites (the Humber Estuary, River Derwent and Lower Derwent Valley) could be affected and potentially, a considerable number of policies/allocations could be implicated. All the potential European sites selected (except the River Derwent) identify 'disturbance' as a key pressure or threat in the relevant SIP (Table 1).
- 3.13. The individual features are considered in turn by site. Inevitably, because of some shared features, this introduces some repetition.





### Screening opinions

#### Humber Estuary

- 3.14. Given the absence of proposed development in close proximity to the estuary or known, functionally-linked land, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the breeding and non-breeding bird populations of the Humber Estuary SPA and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
- 3.15. Similarly, and simply because of the distance between the Plan area and seal haul-out areas, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the grey seal populations of the Humber Estuary SAC and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
- 3.16. Furthermore, with the lack of proposals in the Plan for the creation of physical or other obstructions in watercourses, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the lamprey populations of the Humber Estuary SAC (or River Derwent SAC) and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.

#### River Derwent

- 3.17. Otters are associated with waterways throughout the district and, in common with experiences across much of lowland England, populations have been steadily increasing as water quality, in particular, has improved. Otters are typically nocturnal and elusive and although they will range widely in the rivers and adjacent riparian habitats to forage, holts are typically established away from human influence. As no allocations promote obstructions in the rivers and all are situated far from water courses, no significant effects are anticipated.
- 3.18. Consequently, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the otter populations of the River Derwent (or Lower Derwent Valley SAC) SAC and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
- 3.19. Given the absence of proposals for the creation of physical or other obstructions in watercourses, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the lamprey and bullhead populations of the River Derwent (or Humber Estuary) SAC and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.

#### Lower Derwent Valley

- 3.20. As with otters associated with the River Derwent (above), **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the otter populations of the Lower Derwent Valley SAC (and River Derwent SAC) and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
- 3.21. The Lower Derwent Valley supports diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond. All are equally vulnerable to disturbance from public pressure which could result in their disturbance or displacement.



- 3.22. However, only one policy is considered to affect the location of mobile species on functionally-linked land, the proposal for a new garden village at Elvington (SS13/ST15 – Land West of Elvington Lane). Evidence drawn from ecological reports prepared<sup>26, 27</sup> by two landowners associated with this proposal has confirmed the presence of significant numbers of non-breeding golden plover and lapwing associated with the Lower Derwent Valley SPA utilise land in and around this major new settlement.
- 3.23. The policy wording provides comprehensive mitigation measures including the establishment of extensive areas of wet grassland which would represent ideal habitat for mobile species. However, the policy wording does not make it clear whether this is provided within the allocation boundary or as off-site mitigation. Consequently, there can be no confidence that the demands of the policy wording can be met and harm cannot be ruled out.
- 3.24. This would conflict with the conservation objective for the Lower Derwent Valley SPA to ‘ensure that the integrity of the site is maintained by ...*maintaining ... the extent and distribution ... the structure and function ... and the supporting processes on which the habitats of the qualifying features rely .. and the distribution of the qualifying features ....*’
- 3.25. Furthermore, the mitigation proposed cannot be regarded as embedded characteristics of the policy and must therefore be subjected to further scrutiny via an appropriate assessment.
- 3.26. Therefore, **there is a risk that the proposals contained within Policy SS13/ST15 could undermine the conservation objectives for the non-breeding birds of the Lower Derwent Valley SPA and that a likely significant effect cannot be ruled out (alone). Consequently, the policy must be screened in (Category I) and an appropriate assessment is required.** This policy is capable of resulting in a likely significant effect alone and, therefore, no residual effects are anticipated and there is no need for an in combination assessment at this stage
- 3.27. It should be noted that this evaluation is only concerned with direct effects from new development. Indirect effects resulting from an increased number of visits to the site or land nearby are considered immediately below.

## Potential Effects – Recreation

European Sites	Feature
Humber Estuary SPA and Ramsar	Breeding and non-breeding birds
Lower Derwent Valley SPA, SAC and Ramsar	All habitats Breeding and non-breeding birds, and otter
River Derwent SAC	Floating vegetation community Otter
Skipwith Common SAC	Wet and Dry heath
Strensall Common SAC	Wet and Dry heath

## Context

- 3.28. For those European sites around York, adverse ecological effects from recreational pressure are largely limited to walking (frequently with dogs).

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- 3.29. The most popular destinations can draw in visitors in great numbers from considerable distances and lead to erosion and disturbance. Less popular sites, or those with fewer facilities, have a smaller catchment, fewer visitors and the issue is typically less problematic. Alternatively, sites managed specifically to encourage large numbers of visitors can tolerate these pressures without causing significant harm.
- 3.30. Excessive recreational pressure typically leads to the disturbance of qualifying species, and a reduction in habitat quality/extent from trampling. It can be particularly problematic on land with open or unauthorised access where desire lines can be created and so compromise site management.
- 3.31. In addition, dogs can not only cause localised eutrophication but can also disturb grazing stock, reducing the effectiveness of site management and a decline in the condition of features not normally considered vulnerable.
- 3.32. Distance or accessibility remain key factors and in general, where modest residential allocations are situated over 5km from a vulnerable European site, then LSE (alone) can often (but not always) be ruled out. Of course, each site is different and other key factors will include the fragility of the feature, size of the development, the accessibility of alternative destinations, the availability of footpaths, public transport and so on
- 3.33. Of note, all purely employment allocations (except E18 which is situated immediately adjacent to Strensall Common SAC) are excluded from consideration in this category; given the reduced opportunities for workers to visit European sites nearby during the working day, any adverse impacts can be screened out, alone.
- 3.34. Table 3 shows that a number of features across five European sites (the Humber Estuary, River Derwent, Lower Derwent Valley and both Skipwith and Strensall Commons) and consequently, numerous policies/allocations could be affected. All the potential European sites selected identify 'disturbance/public access' as a key pressure or threat in the relevant SIP (Appendix A).
- 3.35. Following advice from Natural England, the Council (in collaboration with its neighbour, Selby District Council (reflecting their common interests in the site as it lies within both administrative areas) commissioned Footprint Ecology to carry out a visitor survey of the Lower Derwent Valley. Separately, Selby District Council commissioned Footprint Ecology to carry out the same task at Skipwith Common (which lies solely within its boundaries and far from any proposals in York's Plan). For presentational reasons both surveys were, however, submitted as one report<sup>28</sup> (see Appendix C). Independently, the City of York Council also commissioned the same company to perform a survey at Strensall Common<sup>29</sup> (Appendix D). The outcomes of these three surveys inform consideration of this issue below.
- 3.36. As with 'mobile species' previously, this evaluation is presented by European site to provide clarity albeit with some repetition.

## Screening Opinions

### **Humber Estuary**

- 3.37. Given the absence of proposed development nearby, limited access to the foreshore, compounded by private ownership of much of the functionally-linked land **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the breeding and**

<sup>28</sup> Liley, D. (2018). Visitor surveys at the Lower Derwent SPA/SAC and Skipwith Common SAC. Unpublished report by Footprint Ecology for City of York Council and Selby District Council

<sup>29</sup> Liley, D. & Lake, S., (2019). Visitor surveys and impacts of recreation at Strensall Common SAC. Unpublished report by Footprint Ecology for City of York Council.



**non-breeding bird communities of the Humber Estuary SPA and so likely significant effects alone can be screened out (Category G)**; a visitor survey in 2012<sup>30</sup> suggested that the median distance travelled by visitors (by car) was just 4.4km. There would be no residual effects and no need for an in combination assessment.

### Lower Derwent Valley

- 3.38. The evaluation of this issue is similar to that provided for ‘mobile species’ above. Otters are found in and along the banks of the Lower Derwent Valley (and River Derwent). They are clearly associated with waterways throughout the district and populations have been steadily increasing as water quality, in particular, has improved. Otters are typically nocturnal and elusive and although they will range widely in the rivers and adjacent riparian habitats to forage, holts are typically established away from human influence. Given that access to the riverside is effectively (although not entirely) restricted by management measures and private ownership, adverse effects can be ruled out.
- 3.39. Consequently, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the otter populations of the Lower Derwent Valley (or River Derwent) SAC and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment
- 3.40. Similarly, the network of formal paths and effective field boundaries provides confidence that trampling and other harm of the grassland, wetland and woodlands, combined with their relative resilience, will be avoided. Therefore, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the grassland, wetland and woodland habitats of the Lower Derwent Valley SAC and so likely significant effects (alone) can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
- 3.41. Such mitigating factors do not apply to the bird communities and habitats of the Lower Derwent Valley. This comprises diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond which are vulnerable to disturbance and displacement (and predation by domestic cats). In addition, the terrestrial habitats, especially the grassland communities, are all equally vulnerable to trampling, erosion and the disturbance of stock.
- 3.42. Whilst access to much of the SPA is managed and/or restricted, it is not completely controlled. Furthermore, whilst the majority of functionally-linked land is found on private land, access here can also not be fully managed and some trespass occurs (although this appears to be restricted to existing, local residents from adjacent villages where no further development is proposed via the York Local Plan). Consequently, given the location of the proposed large garden village at Elvington (Policy (SS13/ST15) within a few kilometres of the European site, and the more modest SS18/ST33 within 2km, harmful effects cannot be ruled out if recreational pressure is to increase considerably. All other policies/allocations are considered to be far too distant to result in a measureable effect and are ruled out of further scrutiny.
- 3.43. The policy wording provides comprehensive mitigation measures including the establishment of extensive open areas designed to provide alternative destinations to the European site for informal recreation (whilst also providing functionally-linked land for the SPA). However, the policy wording does not make it clear whether this is provided within the allocation boundary or as off-site mitigation. Consequently, there can be no confidence that the demands of the policy wording can be met and harm cannot be ruled out.



- 3.44. Regarding Policy SS18/ST33, this provides mitigation by ensuring that any new development must accord with principle (iv) to '*undertake a comprehensive evidence based approach in relation to biodiversity to address potential impacts of recreational disturbance on the Lower Derwent Valley Special Protection Area (SPA)/Ramsar/SSSI*'. However, this fails to adequately describe a desired outcome and cannot be relied on to provide adequate mitigation.
- 3.45. Both Policies SS13/ST15 and SS18/ST33 could therefore conflict with the conservation objective for the Lower Derwent Valley SPA to '*ensure that the integrity of the site is maintained by ...maintaining ... the extent and distribution ... the structure and function ... and the supporting processes on which the habitats of the qualifying features rely .. the population ... and the distribution of the qualifying features ....*'
- 3.46. This observation is supported by the outcomes of the Visitor Survey (Appendix C) which, when considering the impacts of recreational pressure, states:
- ... there is the potential for Likely Significant Effects from development for ...the Lower Derwent Valley SPA ...*
- 3.47. Given that the acceptability or otherwise of this proposal is reliant on mitigation, which cannot be regarded as embedded characteristics of the policy, further scrutiny will require an appropriate assessment
- 3.48. Therefore, **it is considered that there is a risk that the proposals contained within Policies SS13/ST15 and SS18/ST33 could undermine the conservation objectives for the breeding and non-breeding birds of the Lower Derwent Valley European site and that a likely significant effect cannot be ruled out (alone). Consequently, the policy must be screened in (Category I) and an appropriate assessment is required.** Each policy is capable of a likely significant effect alone and so there would be no residual effects and no need for an in combination assessment.
- 3.49. It should be noted that despite its proximity to the Lower Derwent Valley, H39 is screened out of the need for further assessment due to the lack of local access other than to a small section of the riverbank where harmful effects are highly unlikely.

### River Derwent

- 3.50. The relatively fragile floating vegetation communities could be considered vulnerable to recreational pressure but given its relative inaccessibility, (in this situation it is essentially restricted to the open water of the river channel) it can be assessed to be immune from such a threat.
- 3.51. Otters are also considered to avoid harm for the same reasons as expressed above for the Lower Derwent Valley.
- 3.52. Therefore, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the River Derwent SAC in terms of the floating vegetation community and otter populations and so likely significant effects (alone) can be screened out (Category G).** There would be no residual effects and no need for an in combination assessment.
- 3.53. For the avoidance of doubt, although the River Derwent runs through the Lower Derwent Valley European site, and is subject to similar levels of access and possible threats, it is argued that the inaccessibility of the aquatic features of the River Derwent make it immune from harm and the need for appropriate assessment identified for the Lower Derwent Valley does not apply to the River Derwent.



- 3.54. As with the Lower Derwent Valley immediately above, H39 is screened out of the need for further assessment due to the lack of local access allied with the intrinsic resilience of aquatic features to recreational pressure.

### Skipwith Common

- 3.55. The dry and wet heathland communities of Skipwith Common SAC are vulnerable to recreational pressure. It is a popular site for (dog) walking with the small, local community but limited places to park currently appear to deter larger numbers from further afield. The site is carefully managed as a National Nature Reserve by Natural England and a mosaic of fenced grazing compartments effectively delineate a network of footpaths which largely prevent the damaging trampling of fragile habitats (although some erosion and widening of paths is evident). That said, even dogs on leads can have the subtle effect of driving grazing stock into cover reducing the effectiveness of the essential grazing management. These issues can only be expected to increase if the local population grows considerably.
- 3.56. However, there are no proposals for development of any scale in close proximity to the European site, with SS18/ST33 being 10km distant, and both ST36 and the garden village at Elvington (SS13/ST15) over 15km away by road.
- 3.57. Yet, this observation is not supported by the outcomes of the Skipwith Common Visitor Survey (Appendix C) which, when considering the impacts of recreational pressure, states:

*... there is the potential for Likely Significant Effects from development for both the Lower Derwent Valley SPA and Skipwith Common SAC.*

- 3.58. However, it should be noted here that the reasons which prompted this particular exercise largely relate to proposed development in the emerging Local Plan of the neighbouring Selby District Council. At the time of writing, it is currently considering a cluster of development in much closer proximity to the site. Whilst not explicitly stated in the report, it can safely be assumed that the above conclusion applies solely to proposed development in Selby and not York, Therefore, the threat of recreational pressure from the latter can be dismissed. Further confidence in this conclusion can be gained from the same report which went on to rule out an adverse effect on the integrity of Skipwith Common from recreational pressure.

Therefore, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the wet heath and dry heath at Skipton Common SAC and so likely significant effects (alone) can be screened out (Category G).** There would be no residual effects and no need for an in combination assessment.

### Strensall Common

- 3.59. Strensall Common supports similar habitats to Skipwith Common and currently experiences similar issues. This large heathland attracts a greater number of visitors although access is heavily influenced by a network of footpaths, limited car parking and active management of parts by the Yorkshire Wildlife Trust; regular closure of large parts of the Common by the MOD to allow for firing practice on the adjacent ranges also reduces public pressure. However, the wet and dry heathland communities which represent a threatened habitat with a restricted distribution in the UK and beyond remain particularly vulnerable to increases in public pressure.
- 3.60. Of particular concern is the worrying of livestock by dogs, especially when off the lead and the degree to which. Given the importance of the grazing regime to site management and the achievement of the conservation objectives, this represents a considerable threat should the number of visitors and their dogs increase.





- 3.61. The Council proposes development at three locations immediately adjacent or in close proximity to the Strensall Common European site (Policies SS19/ST35, E18 and H59). Together these comprise the development of 545 dwellings (500 under SS19/ST35 and 45 under H59) and a 4ha employment area.
- 3.62. However, a number of mitigation measures are embedded in Policy SS19/ST35 that require any development to produce a visitor management strategy, informed by a range of visitor and ecological surveys, to deliver effective, deliverable, mitigation measures prior to any consent; the establishment of a wardening service is also required. In addition, development must provide extensive open space within the development, including a new area of strategic open space (OS12) and restrict direct access to the Common. It is reasonable to presume that together, these would reduce, to some extent, access to the Common by new residents and have some influence on the behaviour of those that did visit the European site (as well as existing visitors) provided that the increase in numbers was modest.
- 3.63. However, this proposed mitigation cannot be regarded as embedded characteristics of the policy and must therefore be subjected to further scrutiny via an appropriate assessment.
- 3.64. No such mitigation is proposed in the policy wording or explanatory text for neither the specific allocations (E18 and H59), nor their over-arching policies (EC1 and H1). Whilst the impact from both can be considered to be less than that provided by SS19/ST35, a function of scale and in terms of E18 its employment use, unrestricted access from both these allocations will still provide a threat.
- 3.65. Together, all three policies have considerable potential to increase public pressure on Strensall Common prompting further trampling, erosion and disturbance of stock. Consequently, the impact of these policies could conflict with the conservation objective for Strensall Common SAC to '*maintain or restore... the extent and distribution ... the structure and function ... and the supporting processes ... of the qualifying natural habitats ...*'
- 3.66. This observation is supported by the outcomes of the Strensall Common Visitor Survey (Appendix D) which although it did not address the risk of likely significant effects, moved directly to consider impact on the integrity of the site, the test normally associated with the appropriate assessment stage. When considering the impacts of recreational pressure, it stated:
- The most concerning impact is worrying of livestock by dogs, which is already resulting in loss of animals and may jeopardise future grazing. It went on to add:*
- (An) adverse integrity on the SAC cannot be ruled out as a result of the quantum of development proposed*
- 3.67. Given that the acceptability or otherwise of this proposal is reliant on mitigation, which cannot be regarded as embedded characteristics of the policy, further scrutiny will require an appropriate assessment
- 3.68. Therefore, given the uncertainty surrounding the impacts of Policies SS19, E18 and H59 **there is a risk that the proposals could undermine the conservation objectives for Strensall Common SAC and that a likely significant effect cannot be ruled out (alone). Consequently, the policy must be screened in (Category I) and an appropriate assessment is required.** Each policy is capable of a likely significant effect alone and given the distance of the European site from other residential allocations, it is considered that there would be no residual effects and no need for an in combination assessment.
- 3.69. All other policies and/or allocations were screened out of the HRA in terms of this potential effect.



## Potential Effects – Air Pollution

European sites	Feature
Lower Derwent Valley SAC and Ramsar	All habitats
River Derwent SAC	Floating vegetation dominated by water crowfoot River lamprey, sea lamprey and bullhead
Skipwith Common SAC	Wet and dry heath
Strensall Common SAC	Wet and dry heath

### Context

- 3.70. Development is typically associated with increased traffic and emissions which can increase the airborne concentration of nitrogen oxides (NO<sub>x</sub>) and the rate of nitrogen deposition from the atmosphere. Impacts are assessed by calculating the relative contribution of the Plan in relation to the relevant *critical level* for NO<sub>x</sub> and the *critical loads* for nitrogen deposition.
- 3.71. Both NO<sub>x</sub> and nitrogen deposition have been associated with impacts on vegetation even though levels fall quickly in the first few metres from roads before gradually levelling out until, beyond 200m, it becomes difficult to distinguish from background levels. In other words, impacts at 10m, 50m or 200m can be very different from that at the roadside. Consequently, only those European sites found within 200m of a road are assessed.
- 3.72. The long-term environmental standard or critical level for NO<sub>x</sub> is 30  $\mu\text{g m}^{-3}$ . It is a precautionary threshold below which there is confidence that adverse effects on vegetation will not arise. The critical loads for nitrogen deposition are specific to each individual feature. These are presented as a range of values and, as a precautionary approach, only the lower values are used as these will exaggerate any negative outcomes.
- 3.73. The contribution made by traffic flows associated with the Plan is termed the '*Process Contribution*' (PC) and is used to calculate the total '*Predicted Environmental Concentration*' (PEC) which equates to the combination of the PC with the existing baseline concentration.
- 3.74. Defra and Environment Agency online guidance states that emissions can be considered to be insignificant where the PC in terms of both critical levels and critical loads is less than 1% and the PEC less than 70% of the long-term environmental standards, respectively. However, building on recent case law in Sussex<sup>31</sup>, this must be considered in combination, not only with other policies in the Plan but also with those in neighbouring authorities. As a consequence, all air quality data took account of local, regional and national trends and evidence.
- 3.75. However, this is not a simple mathematical relationship. Account must be taken of the type of habitats - some are more resilient than others - and the distribution of the designated features - not all are distributed evenly across sites. Furthermore, roadside communities are often highly modified from roadworks, informal footpaths, boundary features, salt spreading in winter and the need for roadside management such as the regular cutting of vegetation. This means that the conservation objectives of a European site may not apply to land in close proximity to a road where the greatest impact from vehicle emissions is likely to be experienced, and where there is little realistic prospect of successfully restoring the site to a favourable condition.

<sup>31</sup> This table is taken from the Handbook albeit with changes to the number and titles of Columns appropriate to this HRA.

<sup>31</sup> Water Resource Management Plan 2014 Strategic Environmental Assessment Post Adoption Statement, Cascade/ Yorkshire Water





- 3.76. It can be seen, therefore, that the additional contributions that might arise from increased traffic are therefore only likely to be significant where the European site lies within 200m of a road, where a feature is known to be sensitive to such effects and where the appropriate critical loads and levels are either exceeded or approaching exceedance.
- 3.77. It should also be noted that employment allocations have the potential to generate specific, point-sourced emissions that may or may not adversely affect European sites. As no information is provided on the latter, it is assumed that for this stage in the assessment process, that no such processes are proposed allowing this assessment to focus solely on road traffic emissions.
- 3.78. Reflecting these and other issues, Natural England's SIPs and supplementary advice (Table 1) all identified air pollution as a key pressure or threat for all four sites identified in this HRA: Lower Derwent Valley, River Derwent, Skipwith Common and Strensall Common.

### Screening opinion

- 3.79. The site assessments below rely heavily on information drawn from the Air Pollution Information System (APIS)<sup>32</sup> and the air quality assessment<sup>33</sup> commissioned by the Council which evaluated data not only from across the City of York but also from neighbouring authorities so providing the cumulative or in combination assessment required. As before, each site is taken in turn.

### River Derwent

- 3.80. The Air Quality Report suggests a mean NO<sub>x</sub> concentration of 16.26  $\mu\text{g m}^{-3}$  in 2015, falling over the Plan period to 10.40  $\mu\text{g m}^{-3}$ . Despite being a mean value, it can be safely assumed that concentrations of NO<sub>x</sub> are currently below the annual Critical Level of 30  $\mu\text{g m}^{-3}$  across the entire European site and are expected to fall further.
- 3.81. Further analysis at three crossing points along the river where emissions from road traffic would be at their highest showed that in terms of NO<sub>x</sub> concentrations, PC and PEC contributions would equate to 4.6% and 39.3% of the long-term environmental standard. Whilst the latter suggests an insignificant outcome, falling well below 70%, the former exceeds the 1% threshold.
- 3.82. The most vulnerable features, the floating vegetation community and fish populations do not benefit from defined critical loads making similar analysis impossible. Although data is presented for the SSSI features, these are not directly comparable to the European site features and so are not relied upon heavily here. However, the mesotrophic/eutrophic nature of the River suggests a tolerance of these existing conditions.
- 3.83. Despite this, given these circumstances, it is uncertain if nitrogen deposition from road traffic would conflict with the conservation objective for the River Derwent SAC ensure *that the integrity of the site is maintained by ... maintaining ... the extent and distribution ... the structure and function ... the supporting processes of the qualifying habitats and species*. Consequently, further scrutiny of the site characteristics is required to thoroughly evaluate the level of threat.
- 3.84. Given the uncertainty associated with the assessment of air pollution impacts at this site, **there is a risk that emissions from road traffic associated with policies in the Plan could undermine the conservation objectives for the floating vegetation community and fish populations of the River Derwent European site and that a likely significant effect cannot be ruled out (alone and in combination). Consequently, the policies must be screened in (Category I) and an appropriate assessment is required.**

<sup>33</sup> Air Quality Assessment: Air Quality Modelling Assessment. Waterman Infrastructure & Environment Ltd, April 2018



- 3.85. Given the requirements of the Wealden decision, this opinion is expressed as alone and in combination as traffic anticipated to be generated by the entire plan has been considered in the air quality assessment. However, given that there is only one, major allocation in close proximity to the river at Elvington (SS13/ST15) with others far distant, it is reasonable, for now, to link this issue with this policy to maintain the overall structure of the HRA. Should the appropriate assessment identify adverse effects on the integrity of the river, then further air quality analysis would be required to identify the particular sources or policies contributing to this effect. Therefore, the subsequent appropriate assessment will evaluate it under Policy SS13/ST15 unless the outcomes demand otherwise.

### Lower Derwent Valley

- 3.86. The Air Quality Report suggests a mean NO<sub>x</sub> concentration of 17.18 $\mu\text{g}\text{m}^{-3}$  in 2015, falling over the Plan period to 11.00  $\mu\text{g}\text{m}^{-3}$ . Despite being a mean value, it can be safely assumed that concentrations of NO<sub>x</sub> are currently below the annual Critical Level of 30  $\mu\text{g}\text{m}^{-3}$  across the entire European site and are expected to fall further.
- 3.87. Evaluating nitrogen deposition against these critical loads, the Air Quality report predicts that nitrogen deposition will fall over the Plan period from 17.36  $\text{kgNha}^{-1}\text{yr}^{-1}$  to 11.31  $\text{kgNha}^{-1}\text{yr}^{-1}$  reflecting wider, anticipated improvements in air quality despite an increased contribution from development promoted by the Plan. Despite being a mean figure, it is reasonable to assume that nitrogen deposition levels across the Lower Derwent Valley also fall below the minimum critical loads of 20-30  $\text{kgNha}^{-1}\text{yr}^{-1}$  (for the representative feature) both now and in the future. Therefore, in terms of nitrogen deposition, the effect of the Plan is considered to be insignificant.
- 3.88. Further analysis showed that in terms of NO<sub>x</sub> concentrations, PC and PEC contributions would equate to 0.1% and 36.8% of the long-term environmental standard. Both fall well below the 1% and 70% thresholds strongly suggesting an insignificant outcome.
- 3.89. The critical loads identified for the habitat of the qualifying breeding and wintering birds struggle to relate to the habitats at the SPA as they tend to describe the more typically associated upland and coastal communities of these species. It is considered that use of these would lead to a flawed outcome and they have been put to one side. However, by adopting figures for the low altitude hay meadows more typical of the Lower Derwent Valley SAC, critical loads of 20-30  $\text{kgNha}^{-1}\text{yr}^{-1}$  are found and are utilised. Critical loads are similarly not available for the alder woodland feature.
- 3.90. Therefore, in terms of nitrogen deposition, this suggested that PC and PEC contributions would equate to 0% and 56% of the lowest critical load. Again, both fall well below the 1% and 70% standards and also strongly suggest an insignificant outcome.
- 3.91. As the European site occupies the same geography to the River Derwent, this outcome is heavily influenced by the lack of major roads nearby. Although the site extends over a large area (1092ha), roads of any magnitude within 200m of the river are few and far between; these comprise a 500m stretch of the A163 that runs alongside the hay meadows just to the west of the river crossing at Bubwith, and two locations found south-east of Wheldrake and in the centre of Thorganby where relatively discrete parcels of land lie within 50m of Church Lane.
- 3.92. Given the low PC and PEC values, no transects were carried out for these specific locations. These meadows are considered sensitive to nitrogen deposition and in order to maintain floristic diversity of the SAC feature and to provide the vegetative structure to support the breeding and wintering birds of the SPA, the use of nitrogen-based inorganic fertiliser is not allowed. Yet, further evidence can be drawn from the ecological characteristics of the valley.
- 3.93. Almost the entire European site is subject to regular, annual flooding. Not only will periodic flooding contribute far greater amounts of nitrogen to the grassland and other habitats than air



- pollution but it is regarded as an integral component of the (semi-) natural system. Recent events suggest that flooding is affecting more land and is becoming more frequent and prolonged.
- 3.94. The River Derwent is described as meso/eutrophic, reflecting its high nutrient load, itself a function of the erosion of soil particles from within its extensive, rural and heavily farmed catchment. The nitrogen load of the river is therefore high, and in flood, is likely to add far more nitrogen to the meadows of the European site than contributions ever could.
  - 3.95. Furthermore, APIS data for the Lower Derwent Valley suggests only 4% of overall nitrogen deposition is caused by local road traffic. Although an approximation and often an underestimate, this strongly suggests the contribution from road traffic will be minor with other sources, such as livestock farming contributing an order of magnitude more.
  - 3.96. Although not assessed by the Air Quality report, it is reasonable to presume that despite the projected increases in traffic across the authority area, the electrification of vehicles and improved efficiency of conventional engines will lead to the overall contribution from road traffic being less at the end of the Plan period than at the start. In effect, the Plan doesn't meaningfully increase nitrogen deposition, it simply slows down the rate of improvement.
  - 3.97. When the impact of flooding is considered alongside the outputs of the air quality study and allied with just the handful of locations where air pollution could affect the site, harmful effects on the habitats of the European site from road traffic can be discounted.
  - 3.98. Given these factors, **it is considered highly unlikely that any proposals in the Plan that would increase the volume of road traffic and air pollution could undermine the conservation objectives (alone and in combination) of the habitats of the Lower Derwent Valley European site and so likely significant effects can be screened out (Category G)**. There would be no residual effects and no need for an in combination assessment.
  - 3.99. This outcome fully takes into account the requirements of the Wealden decision by considering the impact of air pollution from all components of the Plan alongside with those from neighbouring authorities.

### Skipwith Common

- 3.100. The (minimum) critical load for nitrogen deposition at Skipwith Common ( $10\text{--}20 \text{ kgNha}^{-1}\text{yr}^{-1}$ ) is already and clearly exceeded with an average rate of  $19.2 \text{ kgNha}^{-1}\text{yr}^{-1}$  which almost exceeds the maximum critical load.
- 3.101. APIS data for Skipwith Common suggests that 10% of overall nitrogen deposition is caused by local road traffic. Although an approximation and often an underestimate, this strongly suggests the contribution from road traffic will be minor with other sources, such as livestock contributing three times as much. This site was not assessed by the air quality study.
- 3.102. The site extends to almost 300ha across a rural landscape. It is, however, bordered by a minor road to the east and is even bisected by another (although the latter is impassable to most vehicles and so is disregarded by this HRA).
- 3.103. However, the eastern boundary of the site is dominated by a dense scrub and woodland easily extending beyond 20m width at its narrowest point. This is not representative of the designated heathland habitats and also provides an effective barrier to the widespread dispersal of airborne nitrogen.
- 3.104. Although not assessed by the Air Quality report, it is reasonable to presume that despite the projected increases in traffic across the authority area, the electrification of vehicles and improved efficiency of conventional engines will lead to the overall contribution from road traffic being less at



the end of the Plan period than at the start. In effect, the Plan doesn't meaningfully increase nitrogen deposition, it simply slows down the rate of improvement.

- 3.105. Given these factors, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives (alone and in combination) of the features of Skipwith Common SAC and so likely significant effects can be screened out (Category G).** There would be no residual effects and no need for an in combination assessment.
- 3.106. This outcome fully takes into account the requirements of the Wealden decision by considering the impact of air pollution from all components of the Plan alongside with those from neighbouring authorities.

### Strensall Common

- 3.107. The Council proposes development at three locations immediately adjacent or in close proximity to Strensall Common European site (Policies SS19/ST35, E18 and H59). Together these comprise development of 545 dwellings and a 4ha employment area. They will all contribute to higher traffic flows in the area as will other allocations across the city and, potentially, beyond.
- 3.108. The Air Quality report suggests a mean NO<sub>x</sub> concentration of 13.13 µg m<sup>-3</sup> in 2015, falling over the Plan period to 8.40 µg m<sup>-3</sup>. This means that concentrations of NO<sub>x</sub> are currently below the annual Critical Level of 30 µg m<sup>-3</sup> across the entire European site and are expected to fall further. Therefore, in terms of NO<sub>x</sub> the effect of the Plan is considered to be insignificant.
- 3.109. Further analysis showed that in terms of NO<sub>x</sub> concentrations, PC and PEC contributions would equate to 6.5% and 34.5% of the long-term environmental standard. Whilst the latter suggests an insignificant outcome, falling well below 70%, the former clearly exceeds the 1% threshold.
- 3.110. In terms of nitrogen deposition, the report suggested that PC and PEC contributions would equate to 2.8% and 157% of the lowest critical load.
- 3.111. Given these circumstances, air pollution would conflict with the conservation objective for the Strensall Common SAC to '*maintain or restore ... the extent and distribution ... the structure and function ... and the supporting processes ... of the qualifying natural habitats ...*'. Consequently, further scrutiny of the site characteristics is required to thoroughly evaluate the level of threat.
- 3.112. Given the level of exceedance, a likely significant effect cannot be ruled out and **there is a risk that emissions from road traffic associated with Policies SS19/ST35, E18 and H59 could undermine the conservation objectives for Strensall Common SAC and that a likely significant effect cannot be ruled out (alone and in combination). Consequently, the policies must be screened in (Category I) and an appropriate assessment is required.**
- 3.113. Given the requirements of the Wealden decision, this opinion is expressed as alone and in combination as traffic from the entire plan has been considered in the air quality assessment. However, only these three allocation lie in close proximity to the Common (SS19/ST35, H59 and E18)) with others far distant and the cause of any exceedance can be considered likely to originate from here. Therefore, the subsequent appropriate assessment considers it under these three policies.

## Summary of the Screening Exercise and Next Steps

### Summary

- 3.114. The outcomes of this stage of the formal screening assessment are brought together in Table 5 which lists those sites and issues where it has been found that the conservation objectives may be



undermined and where likely significant effects cannot be ruled out. Table 6 lists all the policies in the Plan and summarises the outcome of each preliminary screening decision; the full assessment is provided in Appendix B.

3.115. It should be noted that the conservation objectives in the Table above are heavily summarised, all other policies have been screened out of the need for further scrutiny and that the conclusions in terms of no need for any in combination effects could be subject to review following the appropriate assessment.



**Table 5: Summary of the Screening of the Policies and Allocations**

European site	Issue	Policies	Feature affected	Conservation objectives*	Undermined?	Residual effects?	In combination effect?***	Outcome
Strensall Common SAC	Aquatic environment	SS19/ST35,H59,E18	Heathland communities	Extent and distribution of qualifying habitats	Uncertain	None	None	Appropriate assessment required
	Air pollution	SS19/ST35,H59,E18		Structure and function of qualifying habitats	Uncertain	None	None	
	Recreational pressure	SS19/ST35,H59,E18		Supporting processes for qualifying habitats	Uncertain	None	None	
Lower Derwent Valley SPA	Mobile species	SS13/ST15	Non-breeding birds	Extent and distribution of habitats of qualifying features	Uncertain	None	None	Appropriate assessment required
				Structure and function of habitats of the qualifying features	Uncertain	None	None	
	Recreational pressure	SS13/ST15 & SS18/ST33	Breeding and non-breeding birds	Supporting processes on which habitats rely	Uncertain	None	None	
				Population of qualifying features	Uncertain	None	None	
				Distribution of qualifying features	Uncertain	None	None	
				Structure and function of qualifying habitats	Uncertain	None	None	
				Supporting processes for qualifying habitats	Uncertain	None	None	
River Derwent SAC	Air pollution	SS13/ST15	Floating vegetation communities	Extent and distribution of qualifying habitats and those of qualifying species	Uncertain	None	None	Appropriate assessment required



European site	Issue	Policies	Feature affected	Conservation objectives*	Undermined?	Residual effects?	In combination effect?***	Outcome
			Bullhead, River and sea lamprey	Structure and function of qualifying habitats	Uncertain	None	None	
				Structure and function of habitats of qualifying species	Uncertain	None	None	
				Supporting processes on which habitats rely	Uncertain	None	None	
				Populations of qualifying species	Uncertain	None	None	
				Distribution of qualifying species	Uncertain	None	None	

\*\*\* note that in combination assessment is implied in all air pollution assessments.



3.116. Note, that to avoid confusion between housing policies and allocations which share the same names, eg H3, actual allocations have been renamed with an '(A)' eg H3(A) and housing policies with a '(P)' eg H3(P). This nomenclature is followed throughout the rest of this HRA where a potential for misunderstanding arises. .

**Table 6: Summary of the Formal Preliminary Screening of the Policies and Allocations by Category**

Screening outcome	Policies
A General statement of policy Screened out	DP1 SS2 ED1
B General criteria for testing acceptability of proposals Screened out	DP2, DP3, DP4, SS1 EC1, EC2 R1, R2, R3, R4 H1(P), H2(P), H3(P), H4(P), H8(P), H9(P), H10(P) HW1, HW2, HW3, HW4, HW5, HW7 ED6, ED8 D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, D13, D14 GI7, GB1, GB2, GB3 CC1, CC2, CC3, ENV3, ENV4, ENV5 T1, T7, T8 DM1
C Proposal referred to but not proposed by the Plan Screened out	WM1, WM2 T2
D Environmental protection policy Screened out	GI1, GI2, GI3, GI4, GI5, GI6 OS1, OS2, OS5, OS6, OS7, OS8, OS9, OS10, OS11, OS12 ENV1, ENV2
E Policies or proposals which steer change in such a way as to protect European sites Screened out	None
F Policy that cannot lead to development or other change Screened out	None
G No conceivable effect on a European site Screened out	SS3, SS4, SS5, SS6, SS7, SS8, SS9, SS10, SS11, SS12, SS14, SS15, SS16, SS17, SS20, SS21, SS22, SS23, SS24 EC3, EC4, EC5 E8, E9, E10, E11, E16 H5(P), H6(P), H7(P) H1a(A), H2b(A), H3(A), H5(A), H6(A), H7(A), H8(A), H10(A), H20(A), H22(A), H23(A), H29(A), H31(A), H38(A), H39(A), H46(A), H52(A), H53(A), H55(A), H56(A), H58(A), SH1 HW6





Screening outcome	Policies
	ED2, ED3, ED4, ED5, ED7 GB4, T3, T4, T5, T6, T9 C1
H Policy or proposal with unspecified location which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)	None
I Likely significant effect alone cannot be ruled out Screened in	SS13(ST15), SS18 (SS18/ST33), SS19 (ST35) E18 H59(A)
J Likely significant effect in combination cannot be ruled out Screened in	None
K Policy or proposal with no likely significant effect alone but which lead to in combination effects	None
L Policy or proposal considered to have in combination effects	None – no in combination assessment has been shown to be necessary. Note that the impacts of air pollution are considered in combination as a matter of course.

3.117. It should be noted that some policies will be screened out for certain potential effects and screened in for others. Where this happens, the Policy is categorised according to the most important outcome. Policy SS19/ST35 is a good example. It is screened out (G) in terms of impacts on mobile species but screened in in terms of air pollution (I). Therefore, it is identified in Table 6 and Appendix B as Category 'I'.

## Next Steps

3.118. Overall, this exercise found that it was not possible to screen out likely significant effects alone (Category I) for Policies SS13/ST15, SS18/ST33, SS19/ST35, E18 and H59 for a range of possible but credible impacts regarding air pollution, mobile species and recreational pressure affecting three European sites: the Lower Derwent Valley, River Derwent and Strensall Common. Consequently, an appropriate assessment is required which is presented in Section 4 below.

3.119. All other policies and allocations were screened out of further scrutiny by the HRA.

3.120. An appropriate assessment is now required that will assess whether it can be ascertained that an adverse effect on the integrity of the European sites can be ruled out. Drawing on the recent People Over Wind ruling, this will explore if embedded or additional mitigation measures can avoid a negative outcome.



## 4. APPROPRIATE ASSESSMENT AND INTEGRITY TEST

- 4.1. The screening assessment has identified that likely significant effects have been ruled out for all policies except those listed below which require an appropriate assessment.

European site	Policies	Issue	Feature affected
Strensall Common SAC	SS19/ST35, H59 & E18	Aquatic environment	Wet and dry heathland habitats
		Air pollution	
		Recreational pressure	
Lower Derwent Valley SPA	SS13/ST15	Mobile species	Non-breeding birds
		Recreational pressure	Breeding/non-breeding birds
	SS18/ST33	Recreational pressure	Breeding/non-breeding birds
River Derwent SAC	SS13/ST15	Air pollution	Floating vegetation community River and sea lamprey, and bullhead

- 4.2. The role of the appropriate assessment is to identify whether the competent authority is able to ascertain that the Plan ‘*will not adversely affect the integrity of the European site*’. In line with the recent People Over Wind ruling it will also explore if the mitigation proposed can be applied that would allow a positive conclusion to be drawn. This is the fundamental test of an HRA; competent authorities should not normally consent or adopt proposals that cannot rule out an adverse effect.
- 4.3. The Handbook highlights the ODPM definition of integrity and adds that for a plan-making body to conclude the absence of an adverse effect **it should be convinced that no reasonable scientific doubt remains** though this does not mean it has to be absolute. In terms of the burden of proof, Lord Nimmo-Smith in the Court of Session case of WWF-UK Ltd and RSPB stated:

*I do not accept that this means there must be an absolute guarantee that the site will not be adversely affected ...and the most that can be expected of planning authority ... is to identify the potential risks so far as they may be reasonably foreseeable in light of such information as can reasonably be obtained ... with a view to preventing these risks from materialising.’*

- 4.4. Reference to the Boggis case, which demands a focus on credible and not hypothetical risks, is also relevant. The Handbook addresses the reduced level of evidence in a plan as opposed to a project when carrying out the appropriate assessment and ‘integrity test’. In F.10.1 it states:

*Because the integrity test incorporates the application of the precautionary principle as a matter of law, and because plan assessments are, by their nature, less precise than project assessments, it is important for the assessment process to eliminate the prospect of adverse effects on site integrity in so far as that is possible at the level of specificity inherent in the nature and purpose of the particular plan.*

- 4.5. Bearing this in mind, each site is taken in turn and each issue dealt with. The effectiveness of any mitigation embedded in the policies is considered. If an adverse effect on the integrity of the site cannot be removed even when mitigation is considered, the appropriate assessment will consider if other restrictions are available that could secure a positive outcome. Each issue is concluded with a bespoke statement that represents the integrity test on that site. These individual outcomes are



summarised in Table 7. The appropriate assessment concludes with a final statement that confirms the outcome of the HRA.

- 4.6. It should be noted that the appropriate assessment also explores if residual effects (as described in the screening stage) remain. In this case, this refers to effects that would not result in an adverse effect on the integrity of the site alone but when considered with other residual effects identified elsewhere in the appropriate assessment could combine to harm the integrity of the site. IF any arise, this could prompt an in combination assessment.

## The Appropriate assessment

### STRENSALL COMMON SAC

European site	Policies	Issue	Feature affected
Strensall Common SAC	SS19/ST35, H59 & E18	Aquatic environment	Wet and dry heathland habitats
		Air pollution	
		Recreational pressure	

- 4.7. The screening exercise has concluded that a likely significant effect cannot be ruled out alone for three policies: SS19/ST35, H59 and E18. This is because of concern that:
- Works associated with construction would cause changes to the hydrological regime or aquatic environment of the Common that could harm the wet and dry heath communities;
  - The increase in recreational pressure would lead to trampling, erosion and eutrophication of the fragile heathland communities and interfere with the management of the site by the disturbance of grazing stock; and
  - Increased road traffic pollution would lead to eutrophication of the dry and wet heathland communities.
- 4.8. All three allocations lie immediately adjacent to the European Site; SS19/ST35 provides for 500 new dwellings, H59 for 45 and E18 allows for a 4ha employment area. Each of the three potential effects are taken in turn below:

#### Aquatic environment at Strensall Common – SS19/ST35, H59 and E18

- 4.9. The screening exercise concluded that significant effects on the aquatic environment from built development at Strensall Common SPA cannot be ruled out alone. All policies are considered together.
- 4.10. The HRA prepared by Amec Foster Wheeler<sup>34, 35</sup> for the landowner, evaluated all three allocations. It concluded that (further to site-specific assessment) none would be likely to result in a significant effect on the SAC given the ability to design and employ a range of standard mitigation measures. These included the incorporation of Sustainable Drainage Systems (SUDS) for the management of surface water, use of silt fencing to trap sediment, and the adoption of best practice measures for pollution management embedded within a Construction Management Plan (CEMP).

<sup>34</sup> Amec Foster Wheeler Environment & Infrastructure Limited. December 2017. DIO York Sites: Queen Elizabeth Barracks (QEB). Information to support a Habitats Regulations Assessment.

<sup>35</sup> Amec Foster Wheeler Environment & Infrastructure Limited. December 2017. DIO York Sites: Towthorpe Lines. Information to support a Habitats Regulations Assessment.



- 4.11. The need for these and a number of other mitigation measures are embedded, if not specifically, in Policy SS19/ST35 that require hydrological and related studies to be completed and used to inform the development of effective, deliverable, mitigation measures prior to any consent.
- 4.12. It should be noted here that Amec's HRA was completed before the People Over Wind ruling. Consequently, it is based on the use of mitigation at the screening stage not the appropriate assessment.
- 4.13. Whilst mindful of the different tests employed at these two stages, it is considered that there is no reason to disagree with this conclusion and consequently, the potential threat can be discounted. There is, however, no such requirement that relates directly to Policies E18 and H59. Despite this, as the recommendations made in the Amec HRA simply require the implementation of standard evaluation and construction techniques which are commonplace in such situations, it is considered reasonable to expect that the same measures will be employed as a matter of course when development proposals are submitted for E18 and H59.

#### **Integrity Test for effects on the aquatic environment at Strensall Common – SS19/ST35, H59 and E18**

- 4.14. Consequently, it is concluded that **the Council can ascertain that Policies SS19/ST35, E18 and H59 will have no adverse effect on the integrity of Strensall Common European site in terms of impacts on the aquatic environment. There would be no residual effects and no need for an in combination assessment.**

#### **Recreational pressure at Strensall Common – SS19/ST35, H59 and E18**

- 4.15. The screening exercise concluded that significant effects from recreational pressure on the dry and wet heathland communities at Strensall Common SPA cannot be ruled out alone.
- 4.16. The HRA submitted by the Council (April 2018) concluded that *if proposed amendments are adopted, then the Council can ascertain that Policies SS19/ST35, E18 and H59 will have no adverse effect on the integrity of Strensall Common European site in terms of recreational pressure.*
- 4.17. Because of their different residential and employment characteristics, SS19/ST35 and H59 are considered first, followed by E18.

#### **Policies SS19/ST35 and H59**

- 4.18. This 2018 HRA conclusion for these policies was based on the adoption of a suite of modifications to Policy SS19/ST35 including, but not limited to, the erection of a barrier between the allocation and the Common, the management of open space within the policy area and the development of a funded wardening service to influence public behaviour on the SAC of existing and future residents. Drawing on the experiences of other proposals elsewhere in the country, it was believed that these mitigation measures would provide sufficient confidence to allow an adverse effect on the integrity of the site to be ruled out and, notwithstanding any other issues, to enable the policy to be adopted.
- 4.19. However, in its letter of 4 May 2018 (when referring to the threat posed by recreational pressure) Natural England stated, that:

*(it did) not agree that adverse effects on integrity can be ruled out based on the evidence available.*

And went on to recommend:



*.... that robust and comprehensive visitor assessment will be necessary to determine whether the mitigation outlined in policy SS19 are adequate to offset the impact of the proposal and the wider impact of the plan and allocation H59 in particular.*

- 4.20. Accordingly, the Council commissioned Footprint Ecology to undertake this research and a programme of activities were carried out in late summer 2018. The reports are presented in full in Appendix C but key findings included the following:
- 70% of interviewed visitors brought dogs with 63% accompanied by more than one;
  - Of the 190 dogs accompanying interviewees, 85 (45%) were off the lead during the interview;
  - 43% of dog-walkers visited daily;
  - 78% of all interviewees visited regularly throughout the year;
  - The median distance travelled, as the crow flies, was 2.4km and 75% of visitors came from within a radius of 5.5km;
  - The median length that visitors travelled on the Common was 2.5km;
  - Overall, access to the site was expected to increase by 24%;
  - Housing numbers within 500m of the SAC would increase by 61% as a consequence of the adoption of SS19/ST35 and H59;
  - Access to the site would increase by 63% as a result of new housing within 500m;
  - Recreational impacts, typically comprising trampling, fires, eutrophication from dog fouling etc were evident although these were mostly limited in extent and severity, and generally concentrated in fairly close proximity to the car parks;
  - In contrast, the report identified that the:
 

*... worrying of livestock by dogs, which is already resulting in a loss of animals and may jeopardise future grazing. Appropriate grazing will be a vital tool in restoring the SAC to favourable condition.*
  - The report concluded (in the absence of mitigation) that:
 

*Given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse (effects on the sic) integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity.*
- 4.21. The report went on to discuss potential mitigation measures. In the main, these comprised a range of measures similar to those proposed in the amended Policy SS19/ST35 although it did provide additional elaboration and considered additional site management techniques eg (re-wetting) to influence visitor behaviour.
- 4.22. Again, the outcomes are discussed fully in the report but key findings of each proposed measure are described briefly below:
- 4.23. Significantly, it cast doubt on the effectiveness of the open space within SS19/ST35 and the proposed barrier. In particular, the report raised doubt that it could provide a circular walk of 2.5km (that represented the median distance walked by visitors to the Common) and would, lack the natural setting (highlighted by many interviewees as one of the main reasons to visit the SAC).



- This evidence suggests that the new open space would prove less attractive than anticipated and that new residents would still seek access to the Common.
- 4.24. Although the report recognised that a permanent barrier could restrict direct access to the Common (at least in the short term) it referred to evidence from a similar scenario at Talbot Heath in Dorset where the Secretary of State questioned the effectiveness of a barrier to reduce access to the adjacent SAC/SPA because its permanency could not be guaranteed, and refused the application. The report rightly acknowledges that the MODs current presence provides greater confidence that a barrier could be maintained but questions how long this can be guaranteed.
  - 4.25. Importantly, the report reminds us that around the Thames Basin Heaths European site, where recreational pressure has been studied intensively, residential development is precluded within 400m of the heathlands to reduce the magnitude of recreational pressure. It should be noted though that this was also designed to accommodate the breeding bird interest of the heathland SPA (and the threat posed by predation by pet cats) as well as the habitats of the SAC.
  - 4.26. The report also highlights that once occupied, new residents may well push for greater access over time. Overall, this evidence and opinion raises credible doubts over the long term reliance on the barrier as an effective visitor management tool.
  - 4.27. Turning to site management, the report suggests that areas could be re-wetted and, allied with the use of boardwalks, could encourage visitors to utilise the relatively more robust areas of the site. Significantly, this would have the potential to expand the extent of the wet heath community (one of the two qualifying features of the SAC) without diminishing the area of dry heath. Whilst the report justifiably identifies that this would influence visitor behaviour and reduces the risk of fire, the report is relatively silent on its overall effectiveness.
  - 4.28. Exploring this further, the hot, dry summer of 2018 (when the surveys were conducted) caused many of the existing wetland habitats to dry out and allowed visitors easy access to much of the site. Although not explored in the Footprint report, it is considered that this response to current weather patterns suggests that the permanent establishment of wet heath cannot be guaranteed and could not be relied upon to effectively influence visitor behaviour upon especially given the uncertainties posed by climate change. Furthermore, it should be noted that the summer of 2018 was an exception and much of Strensall Common is actually wet for much of the year casting doubt on the suitability for this as a management tool
  - 4.29. The establishment of a wardening service was proposed in the amendments to Policy SS19/ST35 and by the report. The latter provides evidence of where such schemes have effectively influenced visitor behaviour via a combination of a presence on the ground, education, websites and signage. There can be some confidence that the provision of these services could reduce the impact of a modest increase in recreational pressure by reducing vandalism, steering activity away from fragile areas and, importantly, securing better behaviour from dog-walkers and their dogs.
  - 4.30. However, the report provides evidence of the marked increase in new dwellings within just 500m of the SAC and the disproportionate effect this would have on visitor numbers. Footprint was able to show that given the proximity of SS19/ST35 and H59 to the Common, new residents would probably make frequent visits, often with dogs, resulting in a likely increase of 63% in access. Whilst the condition assessment for the SSSI confirms that the Common is recovering towards or is in favourable condition, it cannot be ruled out that increases in the worrying of livestock by dogs would increase and further compromise the effectiveness of site management and the subsequent delivery of the conservation objectives.





- 4.31. The importance of an effective grazing regime should not be underestimated<sup>36, 37</sup>. Heathlands are best managed by extensive sheep and cattle grazing where the intensity is carefully controlled to ensure the floristic and faunal diversity can be maintained and, where appropriate, restored. The Common is managed by Natural England, Yorkshire Wildlife Trust and the MOD and the grazing regime a requirement of the Higher Level Stewardship agreement.
- 4.32. The worrying of livestock is not simply restricted to the death of animals, though this has occurred, but more importantly, from a management point of view, is that dogs, especially those off the lead, can displace stock, effectively driving them into cover. The consequence is that grazing pressure becomes concentrated in more remote parts of the site to the detriment of those areas more frequently visited. This issue is identified in both Natural England's SIP and Supplementary Advice for the site
- 4.33. This evidence questions whether wardening activities could accommodate the increase in visitors and dogs anticipated to be associated with SS19/ST35 and H59. This concern is drawn into focus when it is considered the report suggests that in the absence of SS19/ST35 and H59, access from all allocations within 7.5km of the SAC would increase by only 6% (without taking account of the open space associated with those more distant allocations which could be expected to reduce the number of visits further). It should be remembered here that 75% of all current visits arise from within 5.5km of the Common.
- 4.34. Furthermore, the report concludes by reminding us that:
- At plan-level HRA it will be necessary to have confidence that the above mitigation measures are feasible and achievable in order to rule out adverse effects on integrity on Strensall Common SAC as a result of increases in recreation there needs to be confidence that the measures will be successful.*
- 4.35. Evidence from around the country shows that all the proposed mitigation measures suggested in Policy SS19/ST35 and Footprint's report could contribute potentially to a reduction in harmful impacts from increased recreational pressure. However, section C5.1 of the Handbook<sup>38</sup> reminds us that for mitigation measures to be taken into account they should be effective, reliable, timely, guaranteed to be delivered and as long term as they need to be. The report provides evidence that the effectiveness of the measures proposed to adequately address the effects of visitor pressure of this scale are likely to be of varying success and the long term implementation of such measures would be challenging.
- 4.36. This HRA considers that the report provides new, strong evidence (or *objective information*) that the proposed mitigation cannot be completely relied upon. Therefore, it confirms the outcomes of the screening exercise that the competent authority would not be able to conclude that Policies SS19/ST35 and H59 would not undermine the conservation objectives for the SAC (which require the maintenance or restoration of the extent and distribution of the heathland communities).
- 4.37. This evidence also contradicts the expectation expressed in the 2018 HRA that the additional requirement for a wardening service would remove the threat of an adverse effect on the integrity of the SAC; the increase in access of 24% is particularly compelling. Fundamentally, this scale of increase, the uncertainty surrounding the effectiveness of mitigation and in particular, the predicted increase in the worrying of livestock, ensures that neither the *preservation of the constitutive characteristics* (Sweetman) nor *the coherence of its ecological structure and function, across* (the)

<sup>36</sup> Grazing management of heathlands. English Nature 2005.

<http://publications.naturalengland.org.uk/publication/72034>

<sup>37</sup> <https://www.buglife.org.uk/advice-and-publications/advice-on-managing-bap-habitats/lowland-heathland>

<sup>38</sup> Principle 2, section C.5.1 of the Habitats Regulations Assessment Handbook



whole area of the European site (ODPM Circ. 06/2005) could be assured. Therefore, an adverse effect on the integrity of the European site cannot be ruled out. This calls into question the suitability of SS19/ST35 and H59 for residential development.

4.38. The Handbook (F.10.1.6 states:

*To include proposals that would be potentially doomed or vulnerable to failure under the Habitats Regulations at project assessment stage was regarded by the European Court's Advocate General as 'faulty planning'.*

*Consequently, if at appropriate assessment stage 2, a plan-making body considers that an adverse effect on site integrity is a real possibility, and would create problems for the delivery of the proposal, the proposal should be deleted from the plan or otherwise modified to enable the plan-making body to ascertain there would not be an adverse effect on the integrity of the site.*

4.39. Between the previous HRA and the Visitor Survey all reasonable mitigation measures have been explored but found to be unreliable. Should alternative measures be proposed, they would have to satisfy the requirements laid down in section C.5.1 of the Handbook (described above) to merit consideration. Mindful of the Handbook's advice and given the absence of further mitigation at this stage, the only course of action remaining is to remove both policies from the Plan.

### **Integrity Test for effects of recreational pressure at Strensall Common – SS19/ST35 and H59**

4.40. **Given the doubts surrounding the effectiveness of mitigation, the only reliable mechanism to avoid an adverse effect on the integrity of the European site is to REMOVE BOTH SS19/ST35 AND H59 FROM THE PLAN.**

4.41. The survey suggests that the remaining allocations within 7.5km of the SAC would still result in a maximum increase in access of 6%. However, the survey was not able to consider the extensive open space associated with some, if not all, these allocations which could reasonably be expected to reduce the number of visits accordingly.

4.42. Therefore, if residential development at SS19/ST35 and H59 is ruled out, it is considered that the remaining allocations within 7.5km can be safely adopted.

### **Policy E18**

4.43. This Policy introduces different aspects associated with recreational pressure. As discussed in the screening exercise, a marked increase in the number of visits from the workforce is not anticipated given that most would be restricted to occasional lunchtime excursions. In contrast, the threat is posed not by employees but by the public utilising the area as a *de facto* public car park, both during and outside normal working hours.

4.44. Given that a considerable number of visitors to the Common arrive by car, one effective, limiting factor remains the size and location of car parks. Furthermore, access to the southern part of the Common is not easy, requiring a long walk from more popular access points to the west; it therefore remains relatively quiet and less exposed to recreational pressure. Should the employment area have no access restrictions, the site could quickly provide extensive new parking facilities and increase the number of visitors or allow existing users with easier access to a greater area of the European site.

4.45. Policy E18 does not currently have any restrictions on access embedded within the policy wording. However, the introduction of a requirement to effectively and permanently etc (cf C.5.1 of the





Handbook) restrict access to employees and *bona fide* business visitors allied with the creation of a suitable barrier further restricting access from within the site then this threat could be completely removed. It is noted that the effectiveness of a barrier at SS19/ST35 was doubted but given the behavioural differences between residents and employees, but it is believed this could be considered to be effective here when considered alongside parking controls and the smaller number of visitors it would have to influence.

- 4.46. These modifications (as outlined above) have now been proposed via changes to Policy EC1 and GI2 which will strengthen the Plan's approach to dealing with applications relating to internationally and nationally important sites.

### **Integrity Test for effects of recreational pressure at Strensall Common - E18**

- 4.47. Therefore, it is concluded that **provided that proposed modifications are made to the wording of Policies EC1 and GI2 to accommodate the restrictions described above, the Council can ascertain that Policy E18 will have no adverse effect on the integrity of Strensall Common European site in terms of recreational pressure. There would be no residual effects and no need for an in combination assessment.**

### **Air pollution at Strensall Common – SS19/ST35, H59 and E18**

- 4.48. The screening exercise concluded that significant effects from air pollution on the dry and wet heathland at Strensall Common SPA cannot be ruled out alone. Given that they lie in such close proximity, they were assessed and are considered together.
- 4.49. The Air Quality report predicts that nitrogen deposition will fall over the Plan period from 24.08 kgNha<sup>-1</sup>yr<sup>-1</sup> to 15.41 kgNha<sup>-1</sup>yr<sup>-1</sup> reflecting wider, anticipated improvements in air quality despite an increased contribution from development promoted by the Plan. However, this shows that both existing and predicted nitrogen deposition at Strensall Common clearly exceed the minimum critical loads of 10-20 kgNha<sup>-1</sup>yr<sup>-1</sup>.
- 4.50. Drawing on screening opinion, the Air Quality report showed that in terms of NO<sub>x</sub> concentrations, PC and PEC contributions would equate to 6.5% and 34.5% of the respective long-term environmental standards. Whilst the latter figure suggests an insignificant outcome, falling well below 70%, the former clearly exceeds the 1% threshold.
- 4.51. In terms of nitrogen deposition, the report suggested that PC and PEC contributions would equate to 2.8% and 157% of the lowest critical load. This time, both clearly exceed the 1% and 70% standards.
- 4.52. Detailed APIS data for Strensall Common suggests that only 8% of overall nitrogen deposition is caused by local road traffic. Although an approximation and often an underestimate, this strongly suggests the contribution from road traffic will be relatively minor with other sources, such as livestock representing almost half (47%) of the total contribution.
- 4.53. Along Towthorpe Moor Lane, road traffic is predicted to decline in real terms across the Plan period so resulting in a corresponding reduction in nitrogen deposition. Furthermore, the SAC boundary here is dominated by extensive scrub and bracken extending several metres into the European site. These are not representative of the designated heathland habitats and also provide an effective barrier to the widespread dispersal of airborne nitrogen. Consequently, harmful effects on Strensall Common from traffic along this road can be discounted.
- 4.54. Such mitigating factors do not apply to the north along Lords Moor Lane/York Lane that bisects the site in the north. Here, the road runs (for around 1.5km) through open heathland with wet and dry heath present beyond a few metres distance of the kerbside. Traffic levels are predicted to



increase throughout the Plan period. Although traffic and therefore air quality data meets the needs of the recent Wealden decision to take account of in combination traffic from York and neighbouring authorities this means it doesn't currently identify what contribution the three local allocations make to this. For the purpose of this HRA it is assumed, with some confidence that its location ensures that SS19/ST35, E18 and H59 will contribute by far the vast majority of traffic along Lords Moor Lane/York Lane. None of the HRA of the neighbouring authorities' local plans identified any impact on Strensall Common either from air pollution or any other factor so reducing the possibility of any in combination effects.

- 4.55. Given the expected increases in traffic, and the open heathland it crosses, harmful effects on the vegetation in closest proximity the road cannot be ruled out. However, these roadside communities like most others are considerably modified by the effects of road maintenance, salt-spreading, pollution, ditches, eutrophication from horses and litter, and erosion/compaction from vehicles which encourages the development of scrub or ruderal vegetation. Beyond this strip, which at Strensall frequently extends from the kerb for an estimated 2-5 metres along both sides of the carriageway, the more characteristic heathland communities gradually regain dominance. Despite this, Natural England has assessed heathland here to be in favourable or recovering condition, which can suggest enhanced resilience.
- 4.56. Transects carried out for the Air Quality report identify that roadside nitrogen deposition increases at the kerbside by 2.8% of the PC declining to 1% at 10m suggesting that nitrogen deposition quickly returns to near-background levels. Levels fall to zero somewhere between 50 and 100m from the kerb. However, PEC never appears to fall below 150% anywhere across the site.
- 4.57. It is important to realise that exceeding a 1% threshold does not indicate harm but rather a figure below which the change in concentration or deposition cannot be described as negligible. However, a PEC of 150% is more than double the equivalent threshold and a PC of 2.8% (measured at the kerbside) almost three times the PC threshold. Yet, the overall concentration of NO<sub>x</sub> of 13.13 $\mu\text{g}\text{m}^{-3}$  in 2015, falling over the Plan period to 8.40  $\mu\text{g}\text{m}^{-3}$  is well below the critical level of 30  $\mu\text{g}\text{m}^{-3}$ ; it represents a set of contrasting data.
- 4.58. It should be remembered that the 70% threshold also does not equate to harm as any value less than 100% of the critical level or load suggests harm should not arise. Indeed, levels below 70% are relatively rare anywhere in the UK. This situation focuses attention back onto the critical loads
- 4.59. If it is accepted that the 1% increase in PC nitrogen deposition is an almost imperceptible increase over background levels, then rates above this are restricted to a strip 10m wide, on each side of the carriageway for a 1500m stretch of the European site where vegetation could be measurably affected. It should be noted that the traffic models seem to suggest that vehicle numbers decline significantly part-way along Lords Moor Lane/York Lane but this is discounted as what appears to be erroneous data. Together, this scenario suggests a total area potentially affected along Lords Moor Lane/York Lane would be limited to 3.0ha or 0.53% of the area of the European site.
- 4.60. This could be sufficient to conclude an adverse effect on the integrity of the site. However, the effect of incremental increases in nitrogen deposition on the species richness of lowland heath is addressed in NERC 210<sup>39</sup>. Table 21 of NERC 210 shows that for species richness to decline by one (species) would require an increase in nitrogen deposition of 1.3 kgNha<sup>-1</sup>yr<sup>-1</sup>. Yet, even the highest rate of deposition attributed to development of 0.281 kgNha<sup>-1</sup>yr<sup>-1</sup> (found at the roadside) at the end of the Plan period would be an order of magnitude below this threshold (when overall deposition would also have declined to c15 kgNha<sup>-1</sup>yr<sup>-1</sup>), The impact on the heathland

<sup>39</sup> CAPORN, S., FIELD, C., PAYNE, R., DISE, N., BRITTON, A., EMMETT, B., JONES, L., PHOENIX, G., S POWER, S., SHEPPARD, L. & STEVENS, C. 2016. *Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance*. Natural England Commissioned Reports, Number 210.



communities further away from the roadside would be correspondingly less as nitrogen deposition declines with distance.

- 4.61. Therefore, this suggests that increases in nitrogen deposition caused by development proposed in the Plan would not result in a decline in species richness and can be interpreted to mean that an adverse effect on the integrity of the European site is avoided.
- 4.62. Given the modified nature of vegetation in close proximity to the road, even this conclusion is considered to be a worst case scenario. Furthermore, it could be suggested that any harm is also reversible as deposition will continue to decline into the future. However, this is not expected to result in rapid improvement as existing elevated levels of soil nitrogen will persist for many years and other adverse factors, listed above, are not expected to diminish.
- 4.63. In addition, these observations should be considered in the context that overall, despite the projected increases in traffic, the electrification of vehicles and improved efficiency of conventional engines will lead to the overall contribution from road traffic being less at the end of the Plan period than at the start. In effect, the Plan doesn't meaningfully increase nitrogen deposition, it simply slows down the rate of improvement.
- 4.64. Given the size of the European site, the modest area that could potentially be affected allied with the active management of the site for nature conservation, its favourable or recovering condition and, not least, that air quality is predicted to be better at the end of the Plan period than today, it is concluded that an adverse effect on the integrity of the site can be ruled out; in other words, that both the *preservation of the constitutive characteristics* and *the coherence of its ecological structure and function, across (the) whole area* of the European site would not be harmed.
- 4.65. No evidence of any compelling threat to the River Derwent that could combine with this impact was found in the emerging or adopted local plans of Selby, Harrogate, East Riding, North Yorkshire, North York Moors and Scarborough; at worst Ryedale's was rather ambivalent. Therefore, in combination issues can be ruled out. Given the use of air quality data from within and beyond the Plan area, this outcome can be also considered to have taken account of possible in combination effects as required by the Wealden case.

### **Integrity Test for effects of air pollution at Strensall Common – SS19/ST35, H59 and E18**

- 4.66. Consequently, it is concluded **that the Council can ascertain that Policies SS19/ST35, E18 and H59 will have no adverse effect on the integrity of Strensall Common European site in terms of the impact of air pollution. There would be no residual effects, and no further need for an in combination assessment.**
- 4.67. It should also be noted that should Policies SS19/ST35 and H59 be removed from the Plan as recommended previously, it would be reasonable to expect that air pollution issues would be removed entirely.

### **LOWER DERWENT VALLEY SPA**

European site	Policies	Issue	Feature affected
Lower Derwent Valley SPA	SS13/ST15	Mobile species	Non-breeding birds
		Recreational pressure	Breeding/non-breeding birds



European site	Policies	Issue	Feature affected
	SS18/ST33	Recreational pressure	Breeding/non-breeding birds

- 4.68. The screening assessment has concluded that a likely significant effect cannot be ruled out alone for two policies SS13/ST15 and SS18/ST33. This is because of concern that:
- Increased recreational pressure from SS13/ST15 and ST33 will lead to disturbance of breeding and non-breeding bird populations of the Lower Derwent Valley;
  - Development at SS13/ST15 will affect functionally-linked land currently supporting non-breeding bird communities from the Lower Derwent Valley SPA
- 4.69. Two proposals are relevant, the 147 homes provided for by ST33 in Wheldrake and the garden village of SS13/ST15 at Elvington. These are considered separately below.

### **Recreational pressure at the Lower Derwent Valley - ST33**

- 4.70. This policy encourages the construction of 147 new dwellings within just 2km of the SPA including 'Bank Island', the most important site for breeding birds across the entire European site. Given that the SPA would be perhaps be one of the most obvious destinations for outdoor recreation, the impact of increased public pressure (frequently allied with dog walking) ensured that LSE alone cannot be ruled out.
- 4.71. Policy ST33 already comprises mitigation that seeks to take account of recreational pressure on the SPA but in isolation this was not considered to provide effective safeguards. The 2018 HRA recommended modifications to require any developer to enhance awareness of and access to other, more resilient semi-natural habitats nearby eg Wheldrake Woods. When allied with the resilience of the SPA, in terms of its careful management of visitors, it was considered that this modification would provide confidence that new residents would have a greater choice of destinations for informal countryside recreation and would effectively remove entirely any threat from this policy.
- 4.72. This modification has subsequently been made and is laid out in the Schedule of Minor Modifications (25 May 2018) (CD003). Therefore, it can be concluded that the adoption of this modification would allow the Council to conclude that an adverse effect could be avoided. There would be no residual effects and no need for an in combination assessment.

### **Recreational pressure at the Lower Derwent Valley – SS13/ST15**

- 4.73. Policy SS13/ST15 encourages the development of 3,399 dwellings and around 2,200 units in a new garden village near Elvington. It lies just a few kilometres to the west of the Lower Derwent Valley on land that is functionally-linked to the bird populations of the European site. Furthermore, the Lower Derwent Valley will provide an attractive countryside destination for new residents which could provide a threat to various features of the European site.
- 4.74. Comprehensive requirements for mitigation are already embedded in the existing policy that anticipates the establishment of extensive areas of wet grassland and public open space. Together, these would provide enhanced areas of functionally-linked land for bird populations from the European site and provide alternative countryside recreational opportunities for new residents. However, there are insufficient opportunities within SS13/ST15 to deliver all aspects of the built development alongside the measures to provide public open space and ecological mitigation.



- 4.75. The opportunity to implement these mitigation measures is provided by Policy/Allocation OS10 which is situated immediately adjacent to the west of SS13/ST15. The purpose of OS10 is described as the provision of ‘*significant areas of open space ... in connection with a strategic site*’ designed to ‘*mitigate ... for ecological impacts*’ and, as a ‘*New Area for Nature Conservation on land to the South of the A64 in association with ST15*’. However, there is no formal policy mechanism in SS13/ST15 that ensures both it and OS10 must be pursued together to secure sustainable development.
- 4.76. The screening exercise therefore concluded that likely significant effects could not be ruled out for SS13/ST15 because of uncertainty surrounding the deliverability of (extensive) mitigation proposed in OS10.
- 4.77. The 2018 HRA identified that to provide certainty that the embedded mitigation and open space requirements described in Policy SS13/ST15 can be delivered, it recommended that the Plan was modified to provide a formal link in policy terms with OS10. This would enable delivery of the ecological mitigation whilst public open space can be secured within the footprint of SS13/ST15.
- 4.78. It suggested deleting the phrase ‘**(as shown on the proposals map)**’ in sub-section (iv) and amending sub-section (vi) to read as follows: ‘Incorporation of a new nature conservation area (as shown on the proposals map **as allocation OS10 and included within Policy GI6 New Open Space Provision**)’.
- 4.79. These modifications have now been proposed and are laid out in the Schedule of Minor Modifications (25 May 2018) (CD003) which were submitted alongside the Local Plan. Therefore, it can be concluded that the adoption of this modification would allow the Council to conclude that an adverse effect could be avoided. There would be no residual effects and no need for an in combination assessment.

### **Integrity Test for effects of recreational pressure at the Lower Derwent Valley – SS13/ST15 and ST33**

- 4.80. Consequently, it is **concluded that the Council can ascertain that an adverse effect on the integrity of the Lower Derwent Valley SPA can be avoided for Policies ST33 and SS13/ST15 in terms of the impact from recreational pressure. There would be no residual effects, and no need for an in combination assessment.**

### **Mobile species at the Lower Derwent Valley – SS13/ST15**

- 4.81. This issue relates solely to Policy SS13/ST15 and is closely related to ‘Recreational pressure’ discussed immediately above. Again, a likely significant effect could not be ruled out because of uncertainty surrounding the deliverability of SS13/ST15 and OS10.
- 4.82. Avoiding unnecessary repetition, the modifications proposed under Recreational pressure also accommodate impacts on mobile species and the same outcome is secured. That is, the adoption of a modification to the policy wording recommended in the 2018 HRA would enable the Policy to avoid an adverse effect.
- 4.83. These modifications have now been made and are laid out in the Schedule of Minor Modifications (25 May 2018) (CD003). Therefore, it can be concluded that the adoption of this modification would allow the Council to conclude that an adverse effect could be avoided. There would be no residual effects and no need for an in combination assessment.



## Integrity Test for effects on mobile species at the Lower Derwent Valley – SS13/ST15

- 4.84. **Consequently, it is concluded that the Council can ascertain that an adverse effect on the integrity of the Lower Derwent Valley in terms of the impact on mobile species at Policy SS13/ST15 can be avoided. There would be no residual effects, and no need for an in combination assessment**

### RIVER DERWENT SAC

European site	Policies	Issue	Feature affected
River Derwent SAC	SS13/ST15	Air pollution	Floating vegetation community River and sea lamprey, and bullhead

- 4.85. The screening assessment has concluded that a likely significant effect cannot be ruled out alone for SS13/ST15. This is because of concern that:
- Increased road traffic pollution would lead to eutrophication of the River Derwent and harm the floating vegetation community and the populations of river and sea lamprey, and bullhead

### Air pollution at the River Derwent – SS13/ST15

- 4.86. The screening assessment concluded that a likely significant effect cannot be ruled out in terms of Policy SS13/ST15 (and/or other aspects of the Plan in combination) which lies 3km by road from the Elvington river crossing due to uncertainty regarding the scale of nitrogen deposition within the River Derwent and its impacts on the floating vegetation community. This was largely because this feature does not benefit from critical loads which typically inform traditional evaluation - ultimately, it is the complex relationship between biology and nitrogen that prevents the identification of critical loads for many aquatic features. Consequently, as recommended by APIS, assessments have to be made on a case by case basis.
- 4.87. However, reliance can be placed on generic background data. Drawing on the screening exercise, the Air Quality Report suggested a mean NO<sub>x</sub> concentration of 16.26 ug<sub>m</sub><sup>3</sup> in 2015, falling over the Plan period to 10.40 ug<sub>m</sub><sup>3</sup>. Despite being a mean value, it can be safely assumed that concentrations of NO<sub>x</sub> are currently below the annual Critical Level of 30 ug<sub>m</sub><sup>3</sup> across the entire European site and are expected to fall further.
- 4.88. In terms of nitrogen deposition, the report predicts that nitrogen deposition will fall over the Plan period from 16.26 kgNha<sup>-1</sup>yr<sup>-1</sup> to 11.11 kgNha<sup>-1</sup>yr<sup>-1</sup> reflecting wider, anticipated improvements in air quality despite an increased contribution from development promoted by the Plan. Despite being a mean figure, it is reasonable to assume that nitrogen deposition levels across the Lower Derwent Valley are also similarly modest. However, this is relatively meaningless without a critical load for the features for comparison.
- 4.89. Further analysis at various crossing points along the river where emissions from road traffic would be at their highest showed that in terms of NO<sub>x</sub> concentrations, PC and PEC contributions would equate to 4.6% and 39.3% of the long-term environmental standard. Whilst the latter suggests an insignificant outcome, falling well below 70%, the former exceeds the 1% threshold.





- 4.90. Given these circumstances, air pollution could be considered to conflict with the conservation objective for the River Derwent SAC to '*maintain or restore ... the extent and distribution ... the structure and function ... and the supporting processes ... of the qualifying natural habitats ...*'.
- 4.91. When employing the most sensitive fen, marsh and swamp habitat (with critical loads for nitrogen deposition of 10-20 kgNha<sup>-1</sup>yr<sup>-1</sup>) as a proxy for the aquatic habitat, the report suggested that the maximum possible PC and PEC contributions would equate to 2.0% and 95% of the lowest critical load with a PC value of 0.20 kgNha<sup>-1</sup>yr<sup>-1</sup> and a PEC of 9.52 kgNha<sup>-1</sup>yr<sup>-1</sup>, both below the minimum critical load for the proxy habitat.
- 4.92. Transects at three crossings over the river (Stamford Bridge (A166), Kexby Bridge (A1079) and Elvington (B1228), again using fen, marsh and swamp as a proxy suggested that nitrogen would rapidly disperse at all sites, failing to register a figure (or 0% or below measurable accuracy) at any point at Stamford Bridge, and, at Elvington (closer to SS13/ST15) not exceeding 1% for the first 10m before again effectively falling to 0%. At Kexby, the highest value, at the kerbside was 2% of the minimum critical load for the proxy habitat before falling to 1% at 3m and 0% between 15-20m.
- 4.93. At Stamford and Elvington this means predicted nitrogen deposition is indistinguishable from background readings at the end of the Plan period when traffic could be considered to be at its highest and background levels at their lowest so exacerbating any problems. At Kexby, the figures were effectively double those at Elvington but still modest in the context of the whole river. Given these modest values it was not considered necessary to explore river crossings further afield.
- 4.94. Of course, these outcomes all depend on the sensitivity of the proxy chosen but even if the minimum critical load was reduced to 5kgNha<sup>-1</sup>yr<sup>-1</sup>, the values would still not exceed 4% at Kexby, 2% at Elvington and less at Stamford bridge although it would be measurable at greater distances along the transect. It must be stressed, however, that this is an extreme example and doesn't reflect the characteristics of the river. For instance, and to provide some perspective, the maximum critical load for oligotrophic lakes is only 10 kgNha<sup>-1</sup>yr<sup>-1</sup>.
- 4.95. What is certain, however, is that this degree of nitrogen deposition is not been added to the whole site but only to a handful of point sources at river crossings and minor roads that occasionally, come within 200m of the river; the total contribution from road traffic will therefore be dwarfed by nutrient enrichment by agriculture throughout its extensive catchment. Whilst it is acknowledged that contributions from these point sources will be transported downstream it is evident that these will quickly be diluted and form no measurable component of overall nutrient levels. In summary, they represent isolated point sources across a large river system that occupies over 400ha in area, extends over 86km in length and sits within a catchment of over 2,000sqkm.
- 4.96. This is reflected again by APIS which is able to clarify that only 6% of overall, current nitrogen deposition is currently caused by road traffic. Although an approximation and often an underestimate, this strongly suggests the contribution from road traffic will be minor in comparison with other sources, with livestock farming, for example, contributing an order of magnitude more.
- 4.97. Furthermore, the River Derwent is described as meso/eutrophic, a reflection of its existing high nitrogen load, itself a consequence of the erosion and transport of soil and nutrients from its extensive, rural catchment. Like most similar systems, it is also phosphate and not nitrogen limited. This means that nitrogen deposition is usually a less important consideration than on land (where nitrogen is relatively scarce). Consequently, the control of eutrophication usually concentrates on the removal of phosphorus inputs, for example by wastewater treatment facilities.
- 4.98. Indeed, phosphorus has generally been considered more important than nitrogen in determining the biomass of phytoplankton and the actual trophic state of a river system and APIS goes on to note (when describing eutrophic *standing* waters) that:



*Deposition of ... nitrogen from the atmosphere is unlikely to be the largest source of this nutrient to eutrophic standing waters and, therefore, in general nitrogen deposition is unlikely to be very harmful ... even when close to sources*

- 4.99. The system, and by extrapolation, its features, can therefore be considered to be relatively resilient to nitrogen deposition, a factor borne out to some degree by Natural England's assessment that over 99% of the river is meeting or (the majority) progressing towards favourable condition.
- 4.100. Moreover, any possible impact has to be assessed in the context that overall, despite the projected increases in traffic the electrification of vehicles and improved efficiency of conventional engines will lead to the overall contribution from road traffic being less at the end of the Plan period than at the start. In effect, the Plan doesn't meaningfully increase nitrogen deposition, it simply slows down the rate of improvement.
- 4.101. In this context, otter (which has already been screened out) can be regarded as effectively immune harm. Whilst the floating vegetation community is considered vulnerable to air pollution in the supplementary advice, it should be noted that it permanently occupies the existing, high nutrient water column which again suggests existing resilience to such loads. The fish populations can therefore also be considered to be resilient to existing loads and it is perhaps relevant that Natural England's supplementary advice for the river does not identify 'air quality' as a threat to fish.
- 4.102. Furthermore, all river crossings bear at least some evidence of existing barriers within the river (ie the bridge foundations), considerable shading (and leaf litter) from overhanging trees and pleasure boats. All will have potential to influence the distribution of both fauna and flora perhaps more significantly than the modest addition of nitrogen from vehicles.
- 4.103. Whilst the lack of quantifiable evidence is lacking, the use of a proxy habitat provided strong indications that harm would not arise. Reference to case law (Boggis) is appropriate at this point as it reminds us that threats must be credible and not hypothetical.
- 4.104. Despite the lack of critical loads for the features in question, it is clear that the sources are restricted to a handful of locations, the contributions small and disperse rapidly within a system that carries a high nutrient load with an inherent resilience to nitrogen deposition (shared by its features). It is, therefore, simply not credible that such small, isolated contributions could adversely affect the constitutive characteristics of the European site. Overall, they can safely be regarded as *de minimis* and indistinguishable from background variations allowing adverse effects to be ruled out.
- 4.105. Given the size of the European site, the modest area that could potentially be affected allied and, not least, that air quality is predicted to be better at the end of the Plan period than today, it is concluded that an adverse effect on the integrity of the site can be ruled out completely with no residual effects; in other words, that both the preservation of the constitutive characteristics and the coherence of its ecological structure and function, across (the) whole area of the European site would not be harmed.
- 4.106. Given the use of air quality data from within and beyond the Plan area, this outcome can be also considered to have taken account of possible in combination effects as required by the Wealden case. Therefore, in combination issues can be ruled out.

### **Integrity Test for effects of air pollution on the River Derwent – SS13/ST15**

- 4.107. Consequently, it is concluded **that the Council can ascertain that Policy SS13/ST15 will have no adverse effect on the integrity of the River Derwent SAC in terms of the impact of air pollution. There would be no residual effects, and no further need for an in combination assessment.**





## Summary of Appropriate Assessment and Integrity Tests

4.108. The outcomes of the appropriate assessment are summarised in Table 7 below.

**Table 7: Summary of the Appropriate Assessment**

Issue	Recommended measures	Outcome
Strensall Common SAC Wet and dry heathland Aquatic Environment Policies SS19/ST35, E18 and H59	None required	Adverse effect on the integrity of the site is avoided
Strensall Common SAC Wet and dry heathland Recreational pressure Policies SS19/ST35 and H59	Remove policies SS19/ST35 and H59 from the Plan	Adverse effects on the integrity of the site avoided by removal of policies
Strensall Common SAC Wet and dry heathland Recreational pressure Policies E18	Mitigation must be added to Policy E18 (or similar) to restrict public access	Adverse effect on the integrity of the site will be avoided if mitigation is adopted
Strensall Common Wet and dry heathland Air pollution SS19/ST35, E18 and H59	None required.	An adverse effect on the integrity of the site is avoided with no need for mitigation. There are no residual effects and no need for an in combination assessment.
Lower Derwent Valley Breeding and non-breeding birds Recreational pressure ST33	Mitigation added by schedule of modifications (CB003) adequate to remove threat of adverse effects	Adverse effect on the integrity of the site is avoided
Lower Derwent Valley SPA Breeding and non-breeding birds Recreational pressure SS13/ST15	Mitigation added by schedule of modifications (CB003) adequate to remove threat of adverse effects	Adverse effect on the integrity of the site is avoided
Mobile species Non-breeding birds Lower Derwent Valley Policy SS13/ST15	Mitigation added by schedule of modifications (CB003) adequate to remove threat of adverse effects	Adverse effect on the integrity of the site is avoided
Air pollution Floating vegetation community and populations of river and sea lamprey, and bullhead River Derwent SS13/ST15	None required	Adverse effect on the integrity of the site is avoided

4.109. Table 7 confirms that should the recommended measures be adopted in full, the Council would be able to ascertain that there would be no adverse effect on the integrity of any of the European sites. For the avoidance of doubt, it is considered that adverse effects could be ruled out completely for all sites and all issues with no residual effects.



## 5. OVERALL CONCLUSION OF THE HRA

- 5.1. All policies and allocations were screened for likely significant effects; the individual outcomes of the first exercise without the benefit of mitigation can be found in Tables 5 & 6, and in Appendix B.
- 5.2. Overall, this HRA found that likely significant effects could be ruled out alone for all but five policies which could therefore be excluded from any further scrutiny. However, likely significant effects could not be ruled out alone for policies: SS13/ST15, ST33, SS19/ST35, E18 and H59 in terms of their effects on one or more of Strensall Common, Skipwith Common, the Lower Derwent Valley, the River Derwent.
- 5.3. In terms of Policies SS19/ST35, E18 and H59, likely significant effects could not be ruled out because of anticipated increases in recreational pressure, changes to the hydrological regime and the effect of air pollution on the adjacent Strensall Common SAC.
- 5.4. Similarly, likely significant effects could not be ruled out alone for Policies ST33 because of anticipated increases in recreational pressure on the Lower Derwent Valley nearby.
- 5.5. Finally, likely significant effects could not be ruled out alone for Policy SS13/ST15 for three reasons: again because of anticipated increases in recreational pressure but also for impacts on the bird communities of the Lower Derwent Valley that also utilised land beyond the European site boundary, and the effect of air pollution on the River Derwent SAC.
- 5.6. Accordingly, an appropriate assessment was required. Taking account of recent changes in case law, mitigation was only evaluated at this stage in the HRA.
- 5.7. Upon further scrutiny or by the addition of mitigation measures, it was found that adverse effects on the integrity of all the European sites could be ruled out completely for all these issues except one - the impact of recreational pressure at Strensall Common SAC. Whilst the HRA found that the addition of mitigation measures to Policy E18 would be sufficient to remove the threat of an adverse effect on the integrity of the site, this was not the case with Policies SS19/ST35 and H59. Here, it was found that uncertainty surrounding the effectiveness of the mitigation measures proposed meant that an adverse effect on the integrity could not be ruled out. Given the absence of other mitigation measures, the only option was to remove Policies SS19/SS19/ST35 and H59 from the Plan.
- 5.8. Should these measures be adopted in full, **the Council would be able to ascertain that adverse effects on the integrity of the European sites can be avoided.**



## APPENDICES

### A. Citations and Qualifying Features

#### Lower Derwent Valley SPA

SPA  
Citation

EC Directive 79/049 on the Conservation of Wild Birds: Special Protection Area

#### THE LOWER DERWENT VALLEY

The Lower Derwent Valley covers an area of 1,089.4 hectares, draining a catchment of some 1,362 km<sup>2</sup> before entering the Humber system. It consists of extensive areas of traditionally managed species rich, alluvial flood-meadow, of a kind now highly restricted in the UK.

The boundaries of the proposed Special Protection Area are coincident with those of the existing Derwent Ings SSSI, Melbourne and Thornton Ings SSSI, River Derwent SSSI, Newton Mask SSSI and Brighton Meadows SSSI, apart from the exclusion of the sections of the River Derwent SSSI north of Newton Mask SSSI and south of Brighton Meadows SSSI.

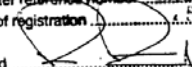
The site qualifies under Article 4.1. by regularly supporting nationally important winter numbers of the following Annex 1 species: 70 Bewick's swan *Cygnus columbianus bewickii* (1% of the UK wintering population), 4,120 Golden plover *Pluvialis apricaria* (2% of the UK wintering population) and 50 Ruff *Philomachus pugnax* (3.5% of the UK wintering population). The site also qualifies under Article 4.1. for holding a mean peak number of 100 Ruff during spring migration.

The site qualifies under Article 4.2. by regularly supporting a breeding population of 50 pairs of Shoveler *Anas clypeata* (3.5% of the UK breeding population).

The site also qualifies under Article 4.2. as an area of international importance to waterfowl by regularly supporting over 20,000 waterfowl in winter. In the five-winter period of 1986/87-1990/91 the site held a mean peak of 27,580 waterfowl, comprising means of 17,415 wildfowl and 10,165 waders. Within this number, the site qualifies under Article 4.2. by holding internationally important numbers of Teal *Anas crecca* and Wigeon *Anas penelope* (4,040 Teal - 4% of UK, 1% of NW Europe, 7,790 Wigeon - 3% of UK, 1% of NW Europe). The site also supports nationally important numbers of the following migratory species: 110 Shoveler *Anas clypeata* (> 1% of UK wintering numbers), 740 Pochard *Aythya ferina* (> 1% of the British wintering population), 100 Whimbrel *Numenius phaeopus* (2% of the UK passage numbers) and 100 Ruff *Philomachus pugnax* (7% of UK passage numbers).

As well as its importance for the individual species listed above, the site is also of strong scientific interest for its exceptionally diverse assemblage of wintering waterfowl.

SPA citation  
ABL  
January 1993

This citation / map refers to a site entered in  
the Register of European sites for Great Britain.  
Register reference number UK0006091  
Date of registration 12 FEB 1994  
Signed   
on behalf of the Secretary of State for the Environment



#### Lower Derwent Valley SAC

SAC  
citation  
including  
qualifying  
features

**EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora**

**Citation for Special Area of Conservation (SAC)**

**Name:** Lower Derwent Valley

**Unitary Authority/County:** East Riding of Yorkshire, North Yorkshire, York

**SAC status:** Designated on 1 April 2005

**Grid reference:** SE703441

**SAC EU code:** UK0012844

**Area (ha):** 915.91

**Component SSSI:** Brighton Meadows SSSI, Derwent Ings SSSI, Melbourne Ings and Thornton Ings SSSI, Newton Mask SSSI

**Site description:**

The Lower Derwent Valley contains a greater area of high-quality examples of lowland hay meadows than any other UK site and encompasses the majority of this habitat type occurring in the Vale of York. The abundance of the rare narrow-leaved water-dropwort *Oenanthe silaifolia* is a notable feature. Traditional management has ensured that ecological variation is well-developed, particularly in the transitions between this grassland type and other types of wet and dry grassland, swamp and fen vegetation. Additionally there is an area of damp alder woodland at Thornton Ellers adjoining marsh and tall fen communities.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*). (Alder woodland on floodplains)\*
- Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*).

**Qualifying species:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Otter *Lutra lutra*

Annex I priority habitats are denoted by an asterisk (\*).

#### Lower Derwent Valley Ramsar

SAC  
Qualifying  
features

- Criterion 2 - Assemblage of wetland invertebrates.
- Criterion 4 – Nationally important populations of ruff *Philomachus pugnax* and whimbrel *Numenius phaeopus* on passage
- Criterion 5 – Internationally important assemblage of wintering birds
- Criterion 6 – Internationally important populations of wigeon *Anas penelope* and teal *Anas crecca*

#### Appendices

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1



#### River Derwent SAC

SAC  
Citation  
including  
qualifying  
features

**EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora**

**Citation for Special Area of Conservation (SAC)**

**Name:** River Derwent

**Unitary Authority/County:** East Riding of Yorkshire, North Yorkshire, York

**SAC status:** Designated on 1 April 2005

**Grid reference:** SE704474

**SAC EU code:** UK0030253

**Area (ha):** 411.23

**Component SSSI:** River Derwent SSSI

**Site description:**

The Yorkshire Derwent is considered to represent one of the best British examples of the classic river profile. This lowland section, stretching from Ryemouth to the confluence with the Ouse, supports diverse communities of aquatic flora and fauna. Fed from an extensive upland catchment, the lowland course of the Derwent has been considerably diverted and extended as a result of glacial action in the Vale of Pickering.

The river supports an aquatic flora uncommon in Northern Britain. Several species, including river water-dropwort *Oenanthe fluviatilis*, flowering rush *Butomus umbellatus*, shining pondweed *Potamogeton lucens*, arrowhead *Sagittaria sagittifolia*, opposite-leaved pondweed *Groenlandia densa* and narrow-leaved water-parsnip *Berula erecta* are more typically found in lowland rivers in southern England.

The Derwent is noted for the diversity of its fish communities, which include river *Lampetra fluviatilis* and sea lampreys *Petromyzon marinus* populations that spawn in the lower reaches, as well as bullhead *Cottus gobio*. The diverse habitats also support otters *Lutra lutra*.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation. (Rivers with floating vegetation often dominated by water-crowfoot)

**Qualifying species:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Bullhead *Cottus gobio*
- River lamprey *Lampetra fluviatilis*
- Otter *Lutra lutra*
- Sea lamprey *Petromyzon marinus*

#### Appendices

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#### Skipwith Common SAC

SAC citation including qualifying features	<p><b>EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora</b></p> <p><b>Citation for Special Area of Conservation (SAC)</b></p> <p><b>Name:</b> Skipwith Common</p> <p><b>Unitary Authority/County:</b> North Yorkshire</p> <p><b>SAC status:</b> Designated on 1 April 2005</p> <p><b>Grid reference:</b> SE668362</p> <p><b>SAC EU code:</b> UK0030276</p> <p><b>Area (ha):</b> 295.20</p> <p><b>Component SSSI:</b> Skipwith Common SSSI</p> <p><b>Site description:</b></p> <p>The wet heath at Skipwith Common is the most extensive of its type in the north of England. The <i>Erica tetralix</i> – <i>Sphagnum compactum</i> community is dominated by cross-leaved heath <i>Erica tetralix</i> and purple moor-grass <i>Molinia caerulea</i>. There is a small population of marsh gentian <i>Gentiana pneumonanthe</i>. The wet heath is part of transitions from open water, fen, reed and swamp to dry heaths and other habitats. The dry heath element is a representative of <i>Calluna vulgaris</i> – <i>Deschampsia flexuosa</i> heath dominated by heather <i>Calluna vulgaris</i>.</p> <p><b>Qualifying habitats:</b> The site is designated under <b>article 4(4)</b> of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> European dry heaths</li> <li><input type="checkbox"/> Northern Atlantic wet heaths with <i>Erica tetralix</i>. (Wet heathland with cross-leaved heath)</li> </ul>
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#### Strensall Common SAC

SAC citation and qualifying features	<p><b>EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora</b></p> <p><b>Citation for Special Area of Conservation (SAC)</b></p> <p><b>Name:</b> Strensall Common</p> <p><b>Unitary Authority/County:</b> York</p> <p><b>SAC status:</b> Designated on 1 April 2005</p> <p><b>Grid reference:</b> SE651598</p> <p><b>SAC EU code:</b> UK0030284</p> <p><b>Area (ha):</b> 569.63</p> <p><b>Component SSSI:</b> Strensall Common SSSI</p> <p><b>Site description:</b></p> <p>Strensall Common is an example of acidic lowland heath represented predominantly by <i>Erica tetralix</i> – <i>Sphagnum compactum</i> wet heath, although its extent has been reduced by drainage. It is a noted locality for marsh gentian <i>Gentiana pneumonanthe</i>, narrow buckler-fern <i>Dryopteris carthusiana</i> and the dark-bordered beauty moth <i>Epione vespertaria</i> as it is associated with creeping willow <i>Salix repens</i> on the wet heath.</p> <p>There is also a complex mosaic of wet heaths with <i>Erica tetralix</i> and dry heath elements. The <i>Calluna vulgaris</i> – <i>Deschampsia flexuosa</i> dry heath is noted for petty whin <i>Genista anglica</i> and bird's-foot <i>Ornithopus perpusillus</i>.</p> <p><b>Qualifying habitats:</b> The site is designated under <b>article 4(4)</b> of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> European dry heaths.</li> <li><input type="checkbox"/> Northern Atlantic wet heaths with <i>Erica tetralix</i> (wet heathland with cross-leaved heath).</li> </ul>
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#### Appendices

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Document Reference: WIE13194-104-1-1





### Humber Estuary SPA

SPA Citation  
(summarised)

#### **EC Directive 79/409 on the Conservation of Wild Birds Special Protection Area (SPA)**

**Name:** Humber Estuary

**Unitary Authorities/Counties:** City of Kingston-upon-Hull, East Riding of Yorkshire, Lincolnshire, North East Lincolnshire, North Lincolnshire

**Component SSSIs:** The SPA encompasses all or parts of the following Sites of Special Scientific Interest (SSSIs): Humber Estuary SSSI, North Killingholme Haven Pits SSSI, Saltfleetby-Theddlethorpe Dunes SSSI, and The Lagoons SSSI.

**Site description:** The Humber Estuary is located on the east coast of England, and comprises extensive wetland and coastal habitats. The inner estuary supports extensive areas of reedbed, with areas of mature and developing saltmarsh backed by grazing marsh in the middle and outer estuary. On the north Lincolnshire coast, the saltmarsh is backed by low sand dunes with marshy slacks and brackish pools. Parts of the estuary are owned and managed by conservation organisations. The estuary supports important numbers of waterbirds (especially geese, ducks and waders) during the migration periods and in winter. In summer, it supports important breeding populations of bittern *Botaurus stellaris*, marsh harrier *Circus aeruginosus*, avocet *Recurvirostra avosetta* and little tern *Sterna albigularis*. **Size of SPA:** The SPA covers an area of 37,630.24 ha.

**Qualifying species:** The site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

**Assemblage qualification:** The site qualifies under **article 4.2** of the Directive (79/409/EEC) as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season: In the non-breeding season, the area regularly supports 153,934 individual waterbirds (five year peak mean 1996/97 – 2000/01), including dark-bellied brent goose *Branta bernicla bernicla*, shelduck *Tadorna tadorna*, wigeon *Anas penelope*, teal *Anas crecca*, mallard *Anas platyrhynchos*, pochard *Aythya ferina*, scaup *Aythya marila*, goldeneye *Bucephala clangula*, bittern *Botaurus stellaris*, oystercatcher *Haematopus ostralegus*, avocet *Recurvirostra avosetta*, ringed plover *Charadrius hiaticula*, golden plover *Pluvialis apricaria*, grey plover *P. squatarola*, lapwing *Vanellus vanellus*, knot *Calidris canutus*, sanderling *C. alba*, dunlin *C. alpina*, ruff *Philomachus pugnax*, black-tailed godwit *Limosa limosa*, bar-tailed godwit *L. lapponica*, whimbrel *Numenius phaeopus*, curlew *N. arquata*, redshank *Tringa totanus*, greenshank *T. nebularia* and turnstone

*Arenaria interpres*. **Non-qualifying species of interest:** The SPA is used by non-breeding merlin *Falco columbarius*, peregrine *F. peregrinus* and short-eared owl *Asio flammeus*, and breeding common tern *Sterna hirundo* and kingfisher *Alcedo atthis* (all species listed in Annex I to the EC Birds Directive) in numbers of less than European importance (less than 1% of the GB population). **Status of SPA:**

- 1) Humber Flats, Marshes and Coast (Phase 1) SPA was classified on 28 July 1994.
- 2) The extended and renamed Humber Estuary SPA was classified on 31 August 2007.

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### Humber Estuary SAC

SAC citation **EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora**

**Citation for Special Area of Conservation (SAC)**

**Name:** Humber Estuary

**Unitary Authority/County:** City of Kingston upon Hull, East Riding of Yorkshire, Lincolnshire, North East Lincolnshire, North Lincolnshire

**SAC status:** Designated on 10 December 2009

**Grid reference:** TA345110

**SAC EU code:** UK0030170

**Area (ha):** 36657.15

**Component SSSI:** Humber Estuary

**Site description:**

The Humber is the second largest coastal plain **Estuary** in the UK, and the largest coastal plain estuary on the east coast of Britain. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion on the tidal rivers of the Ouse and Trent. The range of salinity, substrate and exposure to wave action influences the estuarine habitats and the range of species that utilise them; these include a breeding bird assemblage, winter and passage waterfowl, river and sea lamprey, grey seals, vascular plants and invertebrates.

The Humber is a muddy, macro-tidal estuary, fed by a number of rivers including the Rivers Ouse, Trent and Hull. Suspended sediment concentrations are high, and are derived from a variety of sources, including marine sediments and eroding boulder clay along the Holderness coast. This is the northernmost of the English east coast estuaries whose structure and function is intimately linked with soft eroding shorelines. The extensive mud and sand flats support a range of benthic communities, which in turn are an important feeding resource for birds and fish. Wave exposed sandy shores are found in the outer/open coast areas of the estuary. These change to the more moderately exposed sandy shores and then to sheltered muddy shores within the main body of the estuary and up into the tidal rivers.

Habitats within the Humber Estuary include **Atlantic salt meadows** and a range of sand dune types in the outer estuary, together with **Sandbanks which are slightly covered by sea water all the time**, extensive intertidal mudflats, **Salicornia and other annuals colonising mud and sand**, and **Coastal lagoons**. As salinity declines upstream, reedbeds and brackish saltmarsh communities fringe the estuary. These are best-represented at the confluence of the Rivers Ouse and Trent at Blacktoft Sands.

Upstream from the Humber Bridge, the navigation channel undergoes major shifts from north to south banks, for reasons that have yet to be fully explained. This section of the estuary is also noteworthy for extensive mud and sand bars, which in places form semi-permanent islands. The sand dunes are features of the outer estuary on both the north and south banks particularly on Spurn peninsula and along the Lincolnshire coast south of Cleethorpes. Examples of both **Fixed dunes with herbaceous vegetation ('grey dunes')** and **Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes')** occur on both banks of the estuary and along the coast. Native sea buckthorn **Dunes with *Hippophae rhamnoides*** also occurs on both sides of the estuary.

Significant fish species include **river lamprey *Lampetra fluviatilis*** and **sea lamprey *Petromyzon marinus*** which breed in the River Derwent, a tributary of the River Ouse. **Grey seals *Halichoerus grypus*** come ashore in autumn to form breeding colonies on the sandy shores of the south bank at Donna Nook. Humber Estuary SAC UK0030170  
Compilation date: November 2009 Version: 2 *Designation citation* Page 2 of 2

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Atlantic salt meadows (*Glauco-Puccinellietalia maritima*)
- Coastal lagoons\*
- Dunes with *Hippophae rhamnoides*

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#### Humber Estuary SAC

- Embryonic shifting dunes
- Estuaries
- Mudflats and sandflats not covered by seawater at low tide
- Fixed dunes with herbaceous vegetation ('grey dunes')\*
- Salicornia* and other annuals colonising mud and sand
- Sandbanks which are slightly covered by sea water all the time
- Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes')

**Qualifying species:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Grey seal *Halichoerus grypus*
- River lamprey *Lampetra fluviatilis*
- Sea lamprey *Petromyzon marinus*

Annex I priority habitats are denoted by an asterisk (\*)

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## B. Record of preliminary screening of proposed policies prior to mitigation

Policy	Rationale	Screening outcome
DP1 York Sub Area	This policy represents a vision or aspirations for the City. It does not directly lead to development and so can have no effects on European sites.	A – Screened out
DP2 Sustainable Development	This policy draws on the NPPF to describe the presumption in favour of sustainable development before identifying broad principles for development. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
DP3 Sustainable communities	This policy identifies broad social criteria for evaluating development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
DP4 Approach to Development management	This policy again refers to the presumption in favour of sustainable development before identifying tests for proposals that apply if the proposals lie outside the Plan. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
SS1 Delivering Sustainable Growth	This policy identifies high level housing and employment targets but does not identify development sites, instead identifying broad principles for development. It does not directly lead to development and so can have no effects on European sites. Individual housing and employment allocations are considered in under their specific, respective policies.	B – Screened out
SS2 Green Belt	This policy identifies the extent and role of the Green Belt without adding criteria for development proposals. It does not directly lead to development and so can have no effects on European sites.	A – Screened out
SS3/ST5, ST20 & ST32 York City Centre	This policy makes provision for development within York City Centre (ST5, ST20, and ST32) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS4/ST5 York Central	This policy makes provision for development within York Central (ST5) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS5/ST20 Castle Gateway	This policy makes provision for development within York Central (ST20) at Castle Gateway which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G - Screened out
SS6/ST1	This policy makes provision for development of this urban	G - Screened out

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Policy	Rationale	Screening outcome
British Sugar/Manor School	site (ST1) at British Sugar/Manor School which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	
SS7/ST2 Civil Service Sports Ground	This policy makes provision for development of this urban site (ST2) at the Civil Service Sports Ground which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G - Screened out
SS8/St4 Land adjacent to Hull Road	This policy makes provision for development of this urban extension site (ST4) on Land adjacent to Hull Road which is situated over 10km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS9/St7 East of Metcalfe Lane	This policy makes provision for the development of this garden village (ST7) on Land East of Metcalfe Lane which is situated over 15km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS10/ST8 Land North of Monks Cross	This policy makes provision for the development of this urban extension site (ST8) on Land North of Monks Cross which is situated less than 5km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS11/St9 Land North of Haxby	This policy makes provision for the development of this urban extension site (ST9) on Land North of Haxby which is situated less than 5km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS12/St14 Land West of	This policy makes provision for the development of this garden village (ST14) on Land West of Wigginton Road	G – Screened out

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Policy	Rationale	Screening outcome
Wigginton Road	<p>which is situated approximately 7km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii).</p> <p>No other impacts are anticipated.</p>	
SS13/ST15 Land West of Elvington Lane	<p>This policy makes provision for the development of this new settlement (SS13/ST15) on Land West of Elvington Lane which is situated approximately 7km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley SPA. At such distances localised effects associated with the proximity of development (ie recreational pressure) cannot be ruled out.</p> <p>However, this development is believed to directly affect numbers of the non-breeding golden plover and lapwing populations of the SPA which utilise 'functionally-linked' land far beyond the boundaries of the designated site. Again, harmful effects cannot be ruled out.</p> <p>Comprehensive mitigation measures are embedded in SS13/ST15 and the adjacent Policy OS10 which is proposed to deliver the mitigation measures. However, the Plan fails to adequately ensure that both policies must be implemented together to deliver the necessary ecological safeguards. Consequently, LSE alone cannot be ruled out.</p> <p>Increases in traffic associated with this development and others may increase nitrogen deposition in the Lower River Derwent Valley complex of sites.</p> <p>In contrast, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).</p>	I – Screened in LSE alone
SS14/ST16 Terry's Extension Sites	<p>This policy makes provision for the development of this urban development site (ST16) at Terry's Extension Sites which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).</p> <p>No other impacts are anticipated.</p>	G – Screened out
SS15/St17 Nestle South	<p>This policy makes provision for the development of this urban development site (ST17) at Nestle South which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).</p> <p>No other impacts are anticipated.</p>	G - Screened out
SS16 Land at /St31 Tadcaster Road, Copmanthorpe	<p>This policy makes provision for the development of this urban extension site (ST31) on Land at Tadcaster Road, Copmanthorpe which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).</p> <p>No other impacts are anticipated.</p>	G – Screened out
SS17/St32	<p>This policy makes provision for the development of this urban</p>	

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Policy	Rationale	Screening outcome
Hungate	development site (ST32) at Hungate which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS18/ST33 Station Yard Wheldrake	This policy makes provision for the development of this village extension site (ST33) at Station Yard Wheldrake which is situated just 2km from the most convenient access point to the nearest European site, the Lower Derwent Valley.  At such distance, prior to mitigation LSE alone from recreational pressure cannot be ruled out. Modest mitigation is provided for in the policy but it is vague and ineffective. Although the LDV is well managed and can be resilient to recreational pressure, LSE cannot be ruled out at this stage.  In contrast strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vii).	I – Screened in LSE alone
SS19/ST35 Queen Elizabeth Barracks, Strensall	This policy makes provision for the development of Queen Elizabeth Barracks (SS19/ST35) which is situated adjacent to Strensall Common.  At such close proximity, recreational pressure is will represent a threat but whilst comprehensive mitigation is embedded in Policy SS19/ST35 to restrict access to the Common it does little to influence behaviours within the European site. Consequently, LSE alone from recreational pressure cannot be ruled out.  Harmful effects from changes to the hydrological regime and increases in road traffic emissions have been screened out.  Strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).	I – Screened in LSE alone
SS20/ST36 Imphal Barracks, Fulford Road	This policy makes provision for the development of Imphal Barracks in York (ST36) at Imphal Barracks, Fulford Road which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
SS21/ST26 Land South of Airfield Business Park, Elvington	This policy makes provision for the establishment of this business park (ST26) on Land South of the Airfield Business Park, Elvington which is situated approximately 7km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the business use of the site which will ensure that both the modest workforce will have limited opportunities to visit the European site. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
SS22/ST27 University of	This policy makes provision for the expansion of the University (ST27) which is situated around 13km by road from the most convenient access point to the nearest	G – Screened out

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Policy	Rationale	Screening outcome
York Expansion	European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	
SS23/ST19 Land at Northminster Business Park	This policy makes provision for the establishment of this business park (ST19) on Land at Northminster Business Park which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
SS24/ST37 Whitehall Grange, Wiggington Road	This policy makes provision for the establishment of this business park (ST37) at Whitehall Grange, Wiggington Road which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
EC1 Provision of Employment land	This policy brings together a range of employment allocations together providing a brief description. Given the lack of detail this policy cannot directly lead to development and so can have no effect on European sites. The individual allocations ST5, ST19, ST26, ST27 & ST37 are evaluated under the relevant Spatial Strategy (SS) Policy above, whilst E8, E9, E10, E11, E16 & E18 are evaluated in turn below.	B – Screened out
E8	This policy makes provision for light industrial development and research within Wheldrake (E8) which is situated only around 2km from a convenient access point to the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
E9	This policy makes provision for light industrial development and research within Elvington (E9) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
E10	This policy makes provision for light industrial development within Dunnington (E10) which is situated far from the nearest, European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
E11	This policy makes provision for light industrial development and research within Monks Cross (E11) which is situated several kilometres from the nearest European site. At such	G – Screened out

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Policy	Rationale	Screening outcome
	distances localised effects associated with the workforce from the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	
E16	This policy makes provision for light industrial development near Monks Cross (E11) which is situated several kilometres from the nearest European site. At such distances localised effects associated with the workforce from the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
E18	This policy makes provision for unspecified employment development adjacent to Strensall Common SAC (E18). At such distance, especially as no meaningful avoidance or mitigation measures are put forward in the site policy or overarching policy (H1), LSE alone from recreational pressure cannot be ruled out. In contrast, strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vii).	I – Screened in LSE alone
EC2 Loss of employment land	This policy aims to safeguard employment land before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
EC3 Business within Residential Areas	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
EC4 Tourism	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
EC5 Rural economy	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
R1 Retail hierarchy	This policy seeks to safeguard retail provision in the city centre before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
R2 District and Local Centres and Neighbourhood Parades	This policy seeks to safeguard retail provision in the local centres before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
R3	This policy seeks to support retail provision in the city centre	B – Screened out

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Policy	Rationale	Screening outcome
York City Centre Retail	before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	
R4 Out of Centre Retail	This policy seeks to influence out of town retail provision by identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H1(P) Housing Allocations	This policy simply makes provision for the development of a number of housing allocations. Given the lack of detail this policy cannot directly lead to development and so can have no effect on European sites. The individual housing allocations: H1(P1), H1(P2), H3, H5, H6, H7, H8, H10, H20, H22, H23, H29, H31, H38, H39, H46, H52, H53, H55, H56, H58, H59 are dealt with individually below.  The individual strategic housing allocations ST1, 2, 4, 5, 7, 8, 9, 14, 15, 16, 17, 31, 32, 33, 35 & 36 are considered under their associated spatial strategy (SS) policies above.	B – Screened out
H1 (Phase 1) (A)	This policy makes provision for the development within York (H1Phase 1) at the former Gas Works site at Heworth Green which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
H1 (Phase 2) (A)	This policy makes provision for the development within York (H1 Phase 2) at the former Gas Works site at Heworth Green which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
H3(A)	This policy makes provision for the development (H3) at Burnholme School which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
H5(A)	This policy makes provision for the development (H5) at Lowfield School which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out
H6(A)	This policy makes provision for the development (H6) at The Square on Tadcaster Road which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).  No other impacts are anticipated.	G – Screened out

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Policy	Rationale	Screening outcome
H7(A)	This policy makes provision for the development (H7) at Bootham Crescent which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H8(A)	This policy makes provision for the development (H8) at Askham Bar Park and Ride which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H10(A)	This policy makes provision for the development (H10) at The Barbican which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H20(A)	This policy makes provision for the development (H20) at the Former Oakhaven EPH which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H22(A)	This policy makes provision for the development (H22) at the Former Heworth Lighthouse which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H23(A)	This policy makes provision for the development (H23) at the Former Grove House EPH which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H29(A)	This policy makes provision for the development (H29) at Land at Moor Lane, Copmanthorpe which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H31(A)	This policy makes provision for the development (H29) at Eastfield Lane, Dunnington which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of	G – Screened out

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Policy	Rationale	Screening outcome
	wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	
H38(A)	This policy makes provision for the development (H29) at Rufforth Primary School which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H39(A)	This policy makes provision for the development (H39) North of Church Lane, Elvington which is situated just a few hundred meters from the River Derwent and Lower Derwent Valley European sites, albeit over 5km from the most convenient access point at Wheldrake.  Given the lack of access locally, the proximity of the allocation is considered to be largely irrelevant. Even where access can be gained, the European site is largely confined to the channel and regarded as resilient to public pressure.  In terms of the more distant access at Wheldrake, at such distances, localised effects associated with the proximity of development are possible but unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).	G – Screened out
H46(A)	This policy makes provision for the development (H46) at New Earswick which is situated just over 5km by road from the most convenient access point to Strensall Common. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H52(A)	This policy makes provision for the development (H52) at Willow House EPH which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H53(A)	This policy makes provision for the development (H53) at Knapton Village which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H55(A)	This policy makes provision for the development (H55) on Land at Layerthorpe which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H56(A)	This policy makes provision for the development (H56) on Land at Hull Road which is situated far from the nearest European site. At such distances localised effects	G – Screened out

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Policy	Rationale	Screening outcome
	associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	
H58(A)	This policy makes provision for the development (H29) at Clifton Without Primary School which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H59(A)	This policy makes provision for the development (H59) at Queen Elizabeth Barracks at Strensall which is situated adjacent to Strensall Common European site.  At such distance, especially as no meaningful avoidance or mitigation measures are put forward in the site policy or overarching policy (H1), LSE alone from recreational pressure cannot be ruled out.  In contrast, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii).	I – Screened in LSE alone
H2(P) Density of Residential Development	This policy seeks to influence the density of housing by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H3(P) Balancing the Housing Market	This policy seeks to balance the housing market by identifying criteria to influence the housing mix. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H4(P) Promoting Self-build and Custom House Building	This policy seeks to influence the types and design of housing by identifying criteria to encourage self-build proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H5(P) Gypsies & Travellers	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H6(P) Travelling Showpeople	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H7(P) Student Housing	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vii). No other impacts are anticipated.  The named allocation, SH1, is evaluated as a single	G – Screened out

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Policy	Rationale	Screening outcome
	allocation elsewhere in this table.	
SH1 Student housing	This policy makes provision for the development of student housing at Heweth Croft (SH1) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
H8(P) Houses in Multiple Occupation	This policy seeks to influence the occupancy of student housing by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H9(P) Older Persons Specialist Housing	This policy seeks to influence the provision of specialist housing for older persons by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H10(P) Affordable housing	This policy seeks to influence the provision of affordable housing for older persons by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW1 Community facilities	This policy seeks to secure the retention of existing community facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW2 New community facilities	This policy seeks to influence the provision of new community facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW3 Built sport facilities	This policy seeks to influence the availability of sports facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW4 Childcare provision	This policy seeks to influence the availability of childcare provision by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW5 Healthcare services	This policy seeks to influence the availability of healthcare services by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW6 Emergency Services	This policy seeks to influence the provision of a handful of modest buildings in existing allocations to provide parking facilities for vehicles of the emergency services. Although it does promote development, it is inconceivable that this would result in harmful impacts on European sites.	G – Screened out
HW7 Healthy places	This policy seeks to influence the adoption of healthy places by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ED1 York University	This policy represents a vision or aspirations for the University. It does not directly lead to development and so can have no effects on European sites.	A – Screened out

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Policy	Rationale	Screening outcome
ED2 Campus West	This policy makes provision for the expansion of Campus West which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
ED3 Campus East	This policy makes provision for the expansion of Campus East which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
ED4 York St John University Lord Mayor's Walk Campus	This policy makes provision for the expansion of York St John University Lord Mayor's Walk Campus which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
ED5 York St John University Further Expansion	This policy makes provision for the further expansion of York St John University which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
ED6 Preschool, Primary and Secondary Education	This policy seeks to influence the provision of pre-, primary and secondary schools by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ED7 York and Askham Bryan Colleges	This policy makes provision for the further expansion of York College and Askham Bryan Colleges which are situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G – Screened out
ED8 Access to facilities on education sites	This policy seeks to influence the provision for community access to sport and cultural facilities on educational sites by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D1 Placemaking	This policy seeks to improve poor urban and natural environments by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D2 Landscape and Setting	This policy seeks to promote appreciation of the wider landscape character in design by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out

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Policy	Rationale	Screening outcome
D3 Cultural provision	This policy seeks to promote York's cultural character by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D4 Conservation areas	This policy seeks to promote development that enhances the special character of the area by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D5 Listed buildings	This policy seeks to promote development that preserves the significance and heritage values of buildings by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D6 Archaeology	This policy seeks to influence development that affects archaeological features by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D7 Non-designated Heritage Assets	This policy seeks to influence development that affects non-designated heritage assets by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D8 Historic Parks and Gardens	This policy seeks to influence development that affects historic parks and gardens by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D9 Historic Environment Record	This policy seeks to ensure that the historic record remains accurate and available by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D10 City walls	This policy seeks to conserve and enhance the value of the City Walls by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D11 Alterations to Existing buildings	This policy seeks to promote high quality design for proposals affecting listed buildings by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D12 Shopfronts	This policy seeks to influence the design of shopfronts by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D13 Advertisements	This policy seeks to influence the display of advertisements by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D14 Shutters	This policy seeks to influence the use of security shutters by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GI1 Green infrastructure	This policy seeks to conserve and enhance the natural environment. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
GI2	This policy also seeks to conserve and enhance York's	D – Screened out

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Policy	Rationale	Screening outcome
Biodiversity	biodiversity resource. It provides environmental benefits and will not result in any adverse effects.	
GI3 Green infrastructure network	This policy also seeks to conserve and enhance York's green infrastructure. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
GI4 Trees and hedgerows	This policy also seeks to conserve and enhance York's trees and hedgerows. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
GI5 Open space and playing fields	This policy seeks to protect existing open space of recreational or environmental importance. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
GI6 New open space provision	This policy seeks to safeguard protected areas for nature conservation and secure the establishment of new open space for both recreational and environmental reasons. It provides environmental benefits and will not result in any adverse effects on European sites	D – Screened out
OS1	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS2	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS5	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS6	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS7	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS8	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS9	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS10	This policy seeks to secure new open space to provide mitigation for the adjacent SS13/ST15. The proposed establishment of wet grassland for breeding and non-breeding birds can only benefit the nearby LDV European site.	D – Screened out
OS11	This policy seeks to provide new open space for recreation and amenity. It provides environmental benefits and will not result in any adverse effects on European sites.	D – Screened out
OS12	This policy seeks to secure new open space adjacent to H59. By providing additional space for recreation it can only benefit the adjacent Strensall Common SAC by reducing recreational pressure.	D – Screened out

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Policy	Rationale	Screening outcome
GI7 Burial and Memorial Grounds	This policy seeks to establish new open space for recreational and environmental purposes including the provision of mitigation for certain developments. It does not directly lead to development but does provide the mechanism for avoiding harm on European sites.	B – Screened out
GB1 Development in the Green belt	This policy seeks to influence new development in the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB2 Development in Settlements within the Green Belt	This policy seeks to influence new development in settlements 'washed-over' by the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB3 Re-use of buildings	This policy seeks to influence the reuse of existing buildings within the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB4 Exception sites for Affordable Housing in the Green Belt	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vii). No other impacts are anticipated.	G - Screened out
CC1 Renewable and Low Carbon Energy Generation and Storage	This policy seeks to influence the reduction in carbon emissions from new development alongside renewable power generation by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
CC2 Sustainable design and Construction of New Development	This policy seeks to promote a reduction in carbon emissions and the adoption of climate change adaptation techniques in new development by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
CC3 District Heating and Combined Heat and Power	This policy seeks to promote more sustainable heating and power sources in new development by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ENV1 Air Quality	This policy seeks to safeguard human health but will also protect biodiversity and will not result in any adverse effects on European sites.	D – Screened out
ENV2 Environmental Quality	This policy seeks to influence a wide range of environmental pollutants but will also protect biodiversity and will not result in any adverse effects on European sites.	D – Screened out
ENV 3 Land Contamination	This policy seeks to reduce the environmental effects of contaminated land by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ENV4 Flood Risk	This policy seeks to reduce the level of risk associated with floods by identifying criteria to evaluate proposals. It does	B – Screened out

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Policy	Rationale	Screening outcome
	not directly lead to development and so can have no effects on European sites.	
ENV5 Sustainable Drainage	This policy seeks to reduce excessive surface water drainage from new developments by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
WM1 Sustainable Waste Management	This policy refers to measures contained within and to be delivered by the Minerals and Waste joint Plan established by the Council along with North Yorkshire County Council.	C – Screened out
WM2 Sustainable Minerals Management	This policy refers to measures contained within and to be delivered by the Minerals and Waste joint Plan established by the Council along with North Yorkshire County Council.	C – Screened out
T1 Sustainable Access	This policy seeks to promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T2 Strategic Public Transport Improvements	This policy refers to measures contained within and to be delivered by the Local Transport Plan but also promotes local infrastructure improvements. None threaten European sites.	C – Screened out
T3 York Station and Associated Facilities	This policy promotes development in and around York Station but it is inconceivable that this would result in any adverse impacts on European sites.	G – Screened out
T4 Strategic Highway Network Improvements	This policy promotes local infrastructure improvements across the City including the junction of Strensall Road and the A1237. However, this lies far distant from the SAC and it is inconceivable that this would result in any adverse impacts on European sites.	G – Screened out
T5 Strategic Cycle and Pedestrian Networks	This policy promotes improvements to the cycling and pedestrian network. However, it is inconceivable that this would result in any adverse impacts on European sites.	G – Screened out
T6 Development at or Near Public Transport Corridors and Interchanges	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
T7 Minimising and Accommodating Generated Trips	This policy seeks to reduce traffic and promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T8 Demand Management	This policy seeks to reduce traffic and promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T9 Alternative Fuels and Freight	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would	G – Screened out

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Policy	Rationale	Screening outcome
Centres	result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
C1 – Communications Infrastructure	This policy encourages communications infrastructure but it is inconceivable this will adversely affect European sites.	G – Screened out
DM1 – Infrastructure and Developer Contributions	This policy seeks to ensure the provision of appropriate infrastructure alongside new development. It does not directly lead to development and so can have no effects on European sites.	B – Screened out

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## **C. Lower Derwent and Skipwith Common Visitor Surveys**

### **Appendices**

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Visitor surveys at the Lower Derwent SPA/SAC and Skipwith Common SAC.

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## Summary

This report has been commissioned by City of York Council and Selby District Council to further understand recreational use of the Lower Derwent SPA/SAC/Ramsar and Skipwith Common SAC. The work relates to the Local Plans for each of the two authorities and the implications of the housing development on the designated nature conservation interest.

Visitor surveys involved face-face interviews with visitors, direct counts of people and counts of vehicles parked around the two sites.

In total, 7 counts of parked cars were undertaken on the Lower Derwent SPA (focussing on the stretch between Wheldrake and Bubwith) and six counts at Skipwith Common. Each count involved driving to all parking locations in a short time window and counting the number of cars present at each. These counts revealed a low level of use at both sites, with the total at the Lower Derwent at any one time ranging from 1-11 (median 6) and at Skipwith Common a range of 0-12, median 3.

Surveyors undertook direct counts and interviews at four locations – three on the Lower Derwent and one at Skipwith Common. These were main car-parks/access points. The counts involved a tally of people passing while the surveyor was present. Data were collected for a total of 16 hours at each location, spread across daylight hours and split between weekdays and weekends.

The main car-park at Skipwith Common, on the Cornelius Causeway was the busiest location, with 1.9 groups of people and 1.8 dogs entering the site per hour. No people were recorded at all at one of the Lower Derwent car-parks (North Duffield Carrs). No dogs were recorded at Bank Island.

A total of 50 interviews were conducted, 42% of which were at Skipwith Common. Key findings included:

- Virtually all (92%) of interviews were with those who had undertaken a day trip/short visit directly from home that day
- The most frequently recorded activity across all survey points was dog walking (32% of interviewees). Walking (30% interviewees) and bird or wildlife watching (20%) were also frequently recorded activities.
- There were markedly different activities recorded at the different survey points. Dog walking was mostly at Skipwith Common, rather than the Lower Derwent and no dog walkers were interviewed at all at Bank Island, where walkers (44% of interviewees there) predominated.
- Around a third (32%) of all interviewees visited less than once a month. Dog walkers were the group who visited the most frequently, with 19% visiting daily or most days.

- Many visits were short, with 38% of interviewees spending less than an hour and the most common visit duration was 1-2 hours (40% interviewees).
- Most interviewees (44%) indicated that they visited equally all year round, particularly at Skipwith Common (67%). At the Lower Derwent survey points, while all year round was still the most common response, 21% tended to visit more in the winter and 24% tended to visit more in the summer.
- Nearly half (46%) of those interviewed had been visiting for at least 10 years. There was little in the way of clear differences between sites or activities.
- Overall, most (90%) of interviewees had travelled by car, with only small numbers arriving on foot (4%), by bicycle (4%) or by bus (1%). Cars were the main mode of transport at all survey points.
- Overall the scenery/variety of views was the most common given reason for the choice of site to visit that day, cited by 42% of interviewees (across both the Lower Derwent and Skipwith survey points).
- Close to home was also important (31%). Close to home was very clearly the most common single main reason, with 14% of interviewees stating that was the single main reason for underpinning site choice.
- Close to home featured much more strongly as a reason for site choice at Skipwith Common, where it was cited as frequently as the scenery/variety of views.
- Skipwith Common was also chosen by 7 interviewees because it was good for the dog yet this reason was not recorded for the Lower Derwent sites. The particular wildlife interest at the Lower Derwent was a draw for many.
- Visitors were more faithful to Skipwith Common compared to the Lower Derwent valley, where interviewees tended to visit a greater range of other sites. For example, 34% of the interviewees at Skipwith indicated that at least three-quarters of their weekly visits (for the given activity) took place there. By contrast, at the Lower Derwent the figure was 13% of interviewees.
- Visitor postcodes covered a wide area, including visitors from Cumbria and Nottingham. 40% of visitor postcodes were from the City of York and these were mostly people interviewed at Wheldrake Ings. 27% of the interviewees lived in Selby District, and these were mainly interviewed at Skipwith Common.
- Across all survey points and all interviewees, the median distance from home postcode to interview locations was 11.7km and 75% of interviewees had come from within 15.5km.
- The median distance from home postcode to interview location at Skipwith Common was 8.8km, compared to 11.2 at Wheldrake Ings and 13.2 at Bank Island.
- Visit rate per house declines with distance (i.e. people who live further away visit less), out to around 5km for both the Lower Derwent and

Skipwith Common. This would a differential impact of housing within a 5km radius of the two sites compared to that further away. Beyond 5km visit rates per dwelling appear to change little with distance, indicating the impact of new housing at 6km, 10km or 15km from the sites would be similar.

- A total of 50 routes were mapped, with a line showing the route taken by the interviewee. The mean route length as mapped was 3.04km ( $\pm$  1SE of 0.28km), with a median of 2.5km. Routes ranged from 314m to 7.91km.
- At Bank Island and Wheldrake Ings the data show people moving along the river between the two survey points and at Wheldrake Ings the route to the hides is the key focus, with some visitors following the river bank and others walking directly across the field.
- At Skipwith the routes walked largely reflect the marked routes, including the 'Hidden Archeology' route and the Bombs and Lizards route that includes the Bomb Bays loop.

Overall the results show that the two sites are used for a variety of recreational activities, but the data suggest relatively low levels of use. There were some differences between the Lower Derwent and Skipwith Common. The Lower Derwent appears to draw people from a wider area predominantly for walking and for the wildlife. The sites are promoted as nature reserves and many interviewees were coming for that reason. Marked trails and hides provide the main routes, and are designed to minimise impacts. Potential issues from recreation at the site are predominantly from disturbance to birds and new housing is unlikely to exacerbate disturbance levels unless resulting in a very marked change in the quantum of housing or unless the housing is in very close proximity.

At Skipwith Common the data also suggest relatively low levels of use, however Skipwith Common was busier than the Lower Derwent. The site draws visitors for dog walking (an activity hardly recorded at the Lower Derwent) and some of the key issues at the site include disruption to the grazing as a result of dogs off leads and dog fouling. Dog walkers come from local villages and a marked or step increase in housing in those areas may result in increased recreation pressure at Skipwith. Possible mitigation measures are discussed.



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## Acknowledgements

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Survey work (interviews) were conducted by the following Footprint Ecology field surveyors: Marie Micol, Phil Rotheram and Ben Wray. Fieldwork logistics were overseen by Fenella Lewin (Footprint Ecology) and the route data were digitised by Damiano Weitowitz (Footprint Ecology).

# 1. Introduction

## Overview

- 1.1 This report has been commissioned by City of York Council and Selby District Council to further understand recreational use of the Lower Derwent SPA/SAC/Ramsar and Skipwith Common SAC. The work relates to the Local Plans for each of the two authorities and the implications of the housing development on the designated nature conservation interest.

## The Lower Derwent

- 1.2 The Lower Derwent Valley consists of a network of traditionally managed, species rich alluvial flood-meadows, pastures, waterways and woodland. The flood meadows represent a type of grassland now highly restricted in the UK.
- 1.3 The area of interest (see Map 1) stretches from the B1228 in the north to the village of Wressle in the south. There are various Sites of Special Scientific Interest (SSSIs), designated as nationally important for nature conservation. These include the Derwent Ings SSSI, Melbourne and Thornton Ings SSSI, River Derwent SSSI, Newton Mask SSSI and Brighton Meadows SSSI.
- 1.4 These sites also form part of the Natura 2000 network of European sites, designated as a Special Area of Conservation (SAC) for:
- H91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)
  - H6510 Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)
  - S1355 Otter
- 1.5 The valley is also classified as SPA for its over-wintering and breeding waterbirds:
- A052(non-breeding) Eurasian Teal
  - A050(non-breeding) Eurasian Wigeon
  - A056(breeding) Northern Shoveler
  - A151(non-breeding) Ruff
  - A140(non-breeding) European golden plover
  - Waterbird assemblage
- 1.6 The Lower Derwent is also a Ramsar site, for the following criteria:

- Species-rich alluvial flood-meadow habitat;
- Assemblage of wetland invertebrates (including a range of dragonflies and the leaf hopper *Cicadula ornate* for which the Lower Derwent valley is the only known site in Great Britain);
- Passage waterbirds (notably Whimbrel and Ruff);
- Wintering waterbird assemblage;
- Overwintering Teal and Wigeon.

1.7 The SPA boundary and the relevant SSSIs are shown in Map 1. The SAC boundary (not shown) matches the SPA boundary with the exception of the River itself, which is a separate SAC (the River Derwent SAC).

### Skipwith Common

1.8 Skipwith Common comprises just under 300ha of heathland and wetland habitats. The wet heath is the most extensive of its type in the north of England and the site supports a notable flora including Marsh Gentian.

1.9 The site qualifies as an SAC for:

- H4010 Northern Atlantic wet heaths with *Erica tetralix*
- H4030 European dry heaths

1.10 The site is also of national importance for invertebrates, particularly moths, and its breeding bird assemblage which includes some notable species such as Nightjar.

### Legislative context

1.11 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, which are commonly referred to as the 'Habitats Regulations.' These Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive.

- 1.12 As such, European sites have the benefit of the highest level of legislative protection for biodiversity. Public bodies, including local planning authorities, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For local planning authorities, this means that the combined effect of individual development proposals needs to be assessed collectively for their cumulative impact.
- 1.13 The legislation requires public bodies to be proactive, not reactive. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. This requires public bodies to put measures in place to prevent deterioration of European sites, not to wait until there is harm occurring that needs to be rectified. Where European sites are not achieving their potential, the focus of attention by public bodies should be on restoration.
- 1.14 Public bodies are referred to as ‘competent authorities’ within the legislation. The duties set out within the Habitats Regulations in relation to the consideration of plans and projects are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. The assessment process for plans or projects is called a Habitats Regulations Assessment (‘HRA’).

### Relevant Local Plans and the need for this work

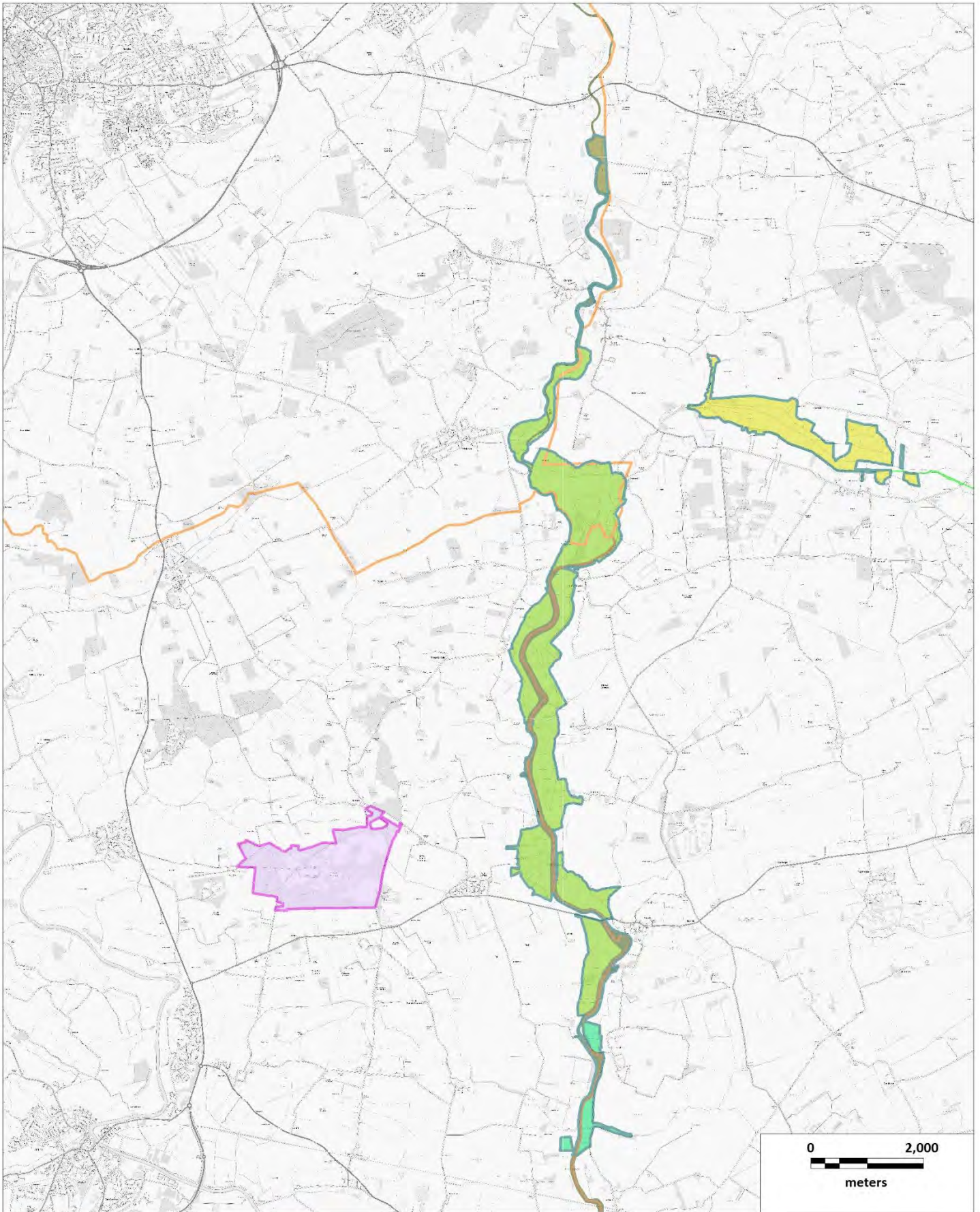
- 1.15 The City of York Local Plan was submitted to the Planning Inspectorate in May 2018. The Plan covers the period from 2017 to 2032/33 and sets out provision to accommodate an annual provision of around 650 new jobs and a minimum annual provision of 867 new dwellings over the plan period.
- 1.16 The HRA that accompanies the submission version of the Plan identified likely significant effects from recreation on the Lower Derwent Valley SPA relating to development in the vicinity, including Policy SS13/ST15 (which relates to the development of 3,399 dwellings in a new garden village near Elvington) and an allocation at Wheldrake (ST33, Station Yard) for 147 units. The HRA identified risks from recreational disturbance to the breeding and non-breeding bird species associated with the SPA. Following more detailed assessment, the HRA advised that adverse effects on integrity could be ruled



out through the provision of educational material and improved accessibility of alternative countryside destinations nearby.

- 1.17 Selby District Council is currently preparing a Sites and Policies Local Plan, 'PLAN Selby' which will deliver the strategic vision outlined in the Core Strategy (adopted in 2013). When PLAN Selby is adopted it will form part of the Local Plan for the district against which planning applications will be assessed. PLAN Selby will incorporate site allocations to promote the growth needs of the district and site specific designations and policies to manage other development proposals. HRA work to accompany Plan Selby has raised the issues of recreation pressure on Skipwith Common and the Lower Derwent Valley.
- 1.18 In light of these HRA findings and the scale of development in the area, the two authorities have jointly commissioned this work, which aims to:
- Provide evidence on current levels of use and patterns of access in the Lower Derwent Valley
  - Understand the visitor origins and potential links with new development



Map 1: Lower Derwent and Skipwith Common and component SSSIs



 City of York boundary  
 Selby District

 Skipwith Common SAC/SSSI  
 Lower Derwent SPA

**Lower Derwent Component SSSIs**

 Brighton Meadows  
 Derwent Ings  
 Melbourne & Thornton Ings  
 Newton Mask  
 Pocklington Canal  
 River Derwent

## 2. Methods

### Overview

- 2.1 Visitor surveys included the following:
- Face-face interviews and direct counts
  - Car-park counts
- 2.2 Details of these different work areas are set out below.

### Face-face interviews and direct counts

- 2.3 These were conducted by a surveyor positioned at an entry point and counted people passing and interviewed a selection of visitors.
- 2.4 The counts were in the form of a tally, recording numbers of groups, people, horses, cycles and dogs (entering, leaving or passing).
- 2.5 Face-face interviews were conducted with a random selection of visitors (the random selection was achieved by selecting the next person seen after completing the previous interview). Only one person per group was interviewed, and no unaccompanied minors were approached.
- 2.6 Surveys were conducted on tablets hosting SNAP survey software and the questionnaire (Appendix 1) was conducted verbally, with the surveyor recording the responses of the interviewee onto the tablet. At the end of the interview the group size, gender of interviewee, number of dogs in group and whether dogs were seen off lead were recorded.
- 2.7 Routes taken by respondents (or planned to be taken if they were just setting off) were recorded by drawing the visitor's route on a paper map linked by a unique reference number to the SNAP questionnaire. These routes were later digitised to give a polyline in GIS.
- 2.8 The interviews and counts took place at four locations (Map 3 and Table 1).

**Table 1: Interview/count locations.**

	Location	Description/ notes	Grid reference
1	Bank Island	NE car-park, next to NE office	SE6904 4470
2	Wheldrake Ings YWT car-park	YWT car-park next to Bailey Bridge	SE6940 4441
3	N. Duffield Carrs	NE car-park on north side of A163.	SE6971 3667
4	Skipwith Common	Main car-park on Cornelius Causeway	SE 6690 3772



- 2.9 Survey times covered: 0700-0900; 1000-1200; 1300-1500; 1700-1900 (by splitting the day into 2 hour blocks the surveyor is able to take comfort breaks yet data are collected from across daylight hours). Each location was surveyed such that each time period was covered on a weekday and weekend day at each location.
- 2.10 Effort was made to avoid adverse weather conditions. The surveys took place during a period of unsettled and changeable weather at the end a prolonged dry and very hot summer. Sixteen hours of survey work were undertaken at each survey point. There was no rain at all at Bank Island. At Wheldrake Ings there was some light rain for less than 30 minutes (over the 16 hours of survey) and at North Duffield Carrs there was some rain for less than an hour. At Skipwith Common it was dry for 7.5 hours out of the 16 and for 2 of the two-hour survey sessions there was continuous rain.

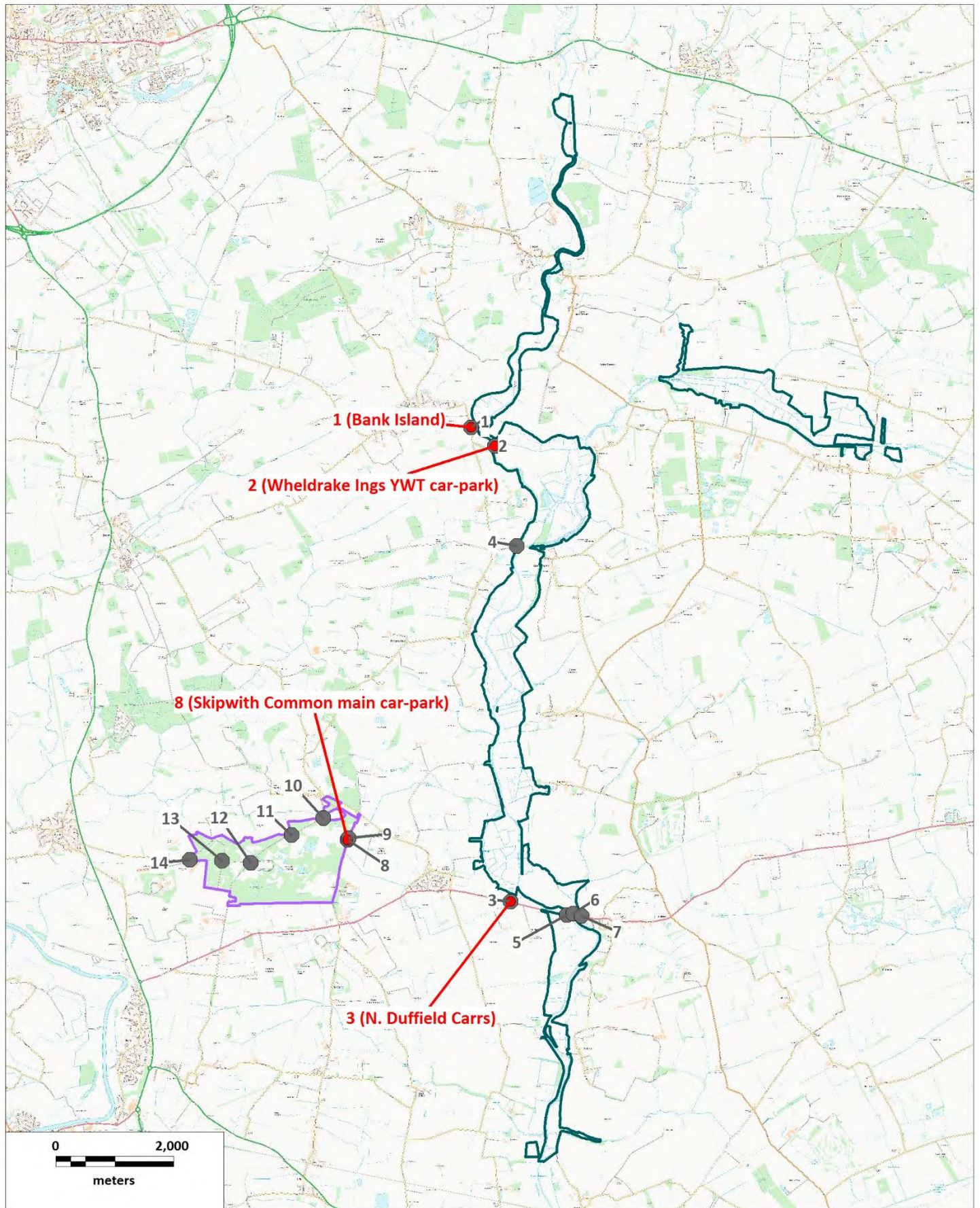
### Car-park counts

- 2.11 Seven transects counting parked cars were undertaken for the Derwent Valley and six were undertaken at Skipwith Common (Table 2). These involved the recorder driving round the site and logging all parked vehicles at the various parking locations (shown in Map 2) including all lay-bys and other informal parking areas. It took around 45 minutes to visit all locations on each transect and the counts were a 'snapshot' in time, reflecting the number of vehicles present when the recorder entered the parking location. Direct of travel was varied between different transects.

**Table 2: Dates and start times of transects counting all parked vehicles around the two sites.**

Date	Route	Start Time	Day
13/07/2018	Derwent only	08:52	Friday
30/07/2018	Derwent & Skipwith	12:38	Monday
14/08/2018	Derwent & Skipwith	08:00	Tuesday
14/08/2018	Derwent & Skipwith	14:25	Tuesday
19/09/2018	Derwent & Skipwith	17:00	Wednesday
22/09/2018	Derwent & Skipwith	10:50	Saturday
22/09/2018	Derwent & Skipwith	17:30	Saturday

Map 2: Lower Derwent and Skipwith survey points



- Interviews/direct counts
- Parking locations included in transect

- Lower Derwent Valley SPA
- Skipwith Common SAC



### 3. Car-park count results

3.1 The number of vehicles ranged counted on the Lower Derwent at any one time ranged from 1 to 11 (7 counts; Figure 1). The median number of vehicles counted was 6 and the mean 5.6. At Skipwith Common the range was similar, ranging from 0 to 12 (6 counts; Figure 1). The median number of vehicles counted was however lower at 2.5 and the mean 3.1. No campervans or commercial vehicles were counted at Skipwith.

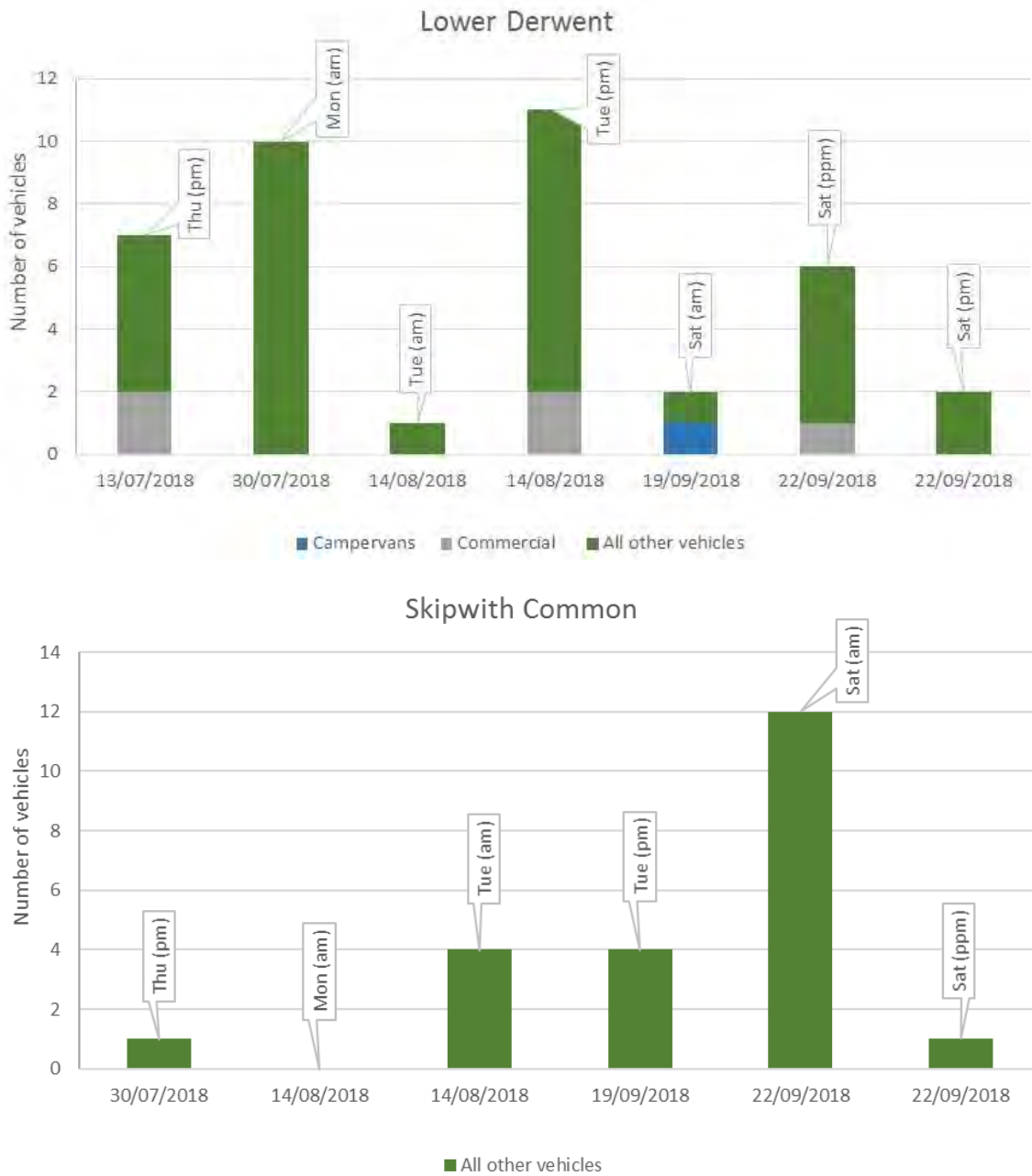
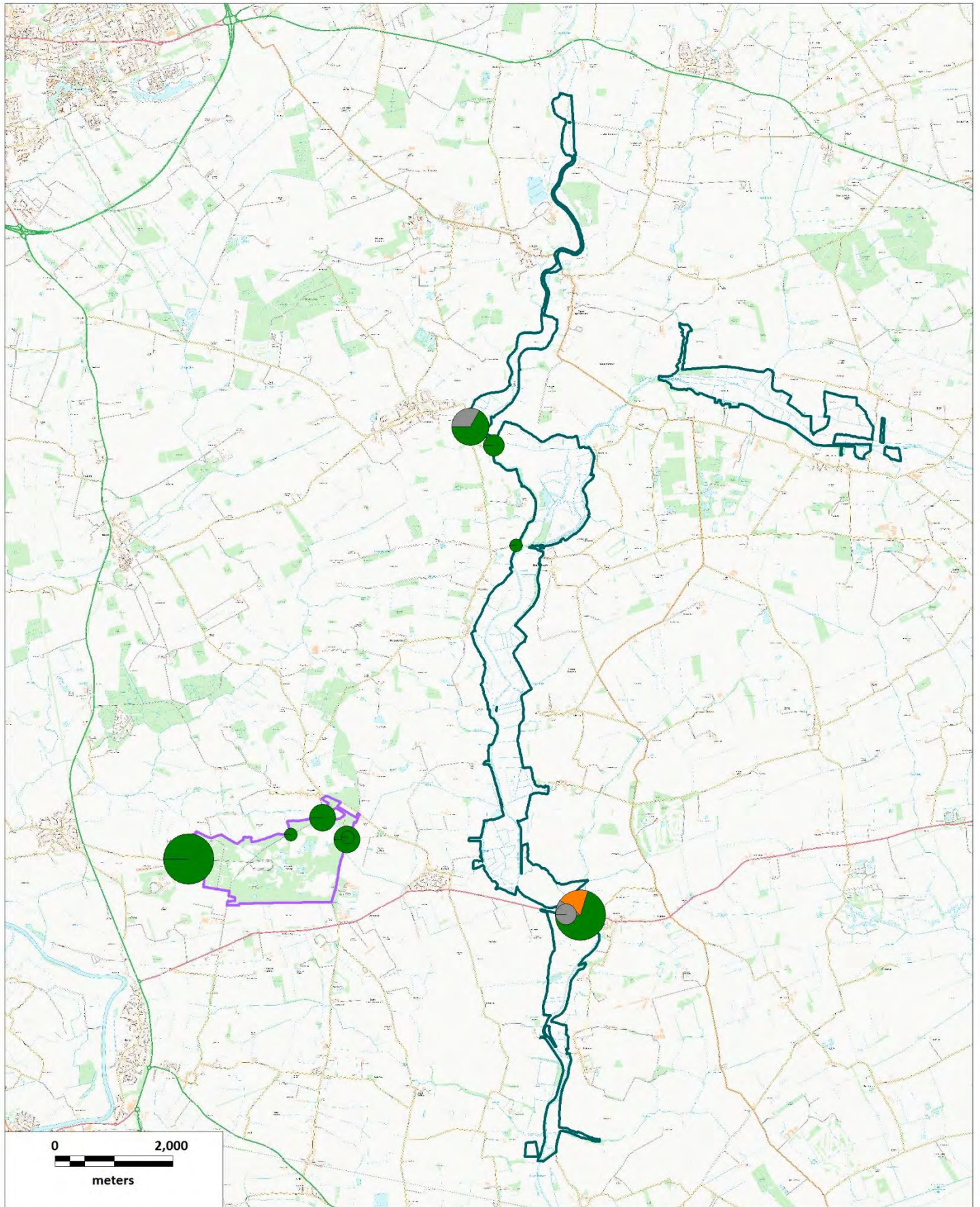


Figure 1: Car-park transect results by date and vehicle types

- 3.2 The results are shown spatially in Map 3. In order to allow direct comparison between locations, the map shows the total across the six counts where both Skipwith and the Lower Derwent were covered.
- 3.3 All locations were relatively quiet. The map shows that the only location where any campervans was recorded was Bubwith Bridge and also highlights that the only vehicles using the informal parking on the west of Bubwith Bridge were commercial vehicles. Commercial vehicles were logged separately as these were often thought to involve work vans or similar that had pulled over and did not necessarily involve people on recreational visits. The King Rudding Lane car-park was the car-park with the highest number of vehicles at Skipwith, notably however these were on two occasions (counts of 3 vehicles and 7 vehicles) while on the other four counts there were no vehicles recorded in this car-park.



Map 3: Lower Derwent and Skipwith car count results





0 2,000  
meters

-  Lower Derwent Valley SPA
-  Skipwith Common SAC

Total vehicles (from 6 counts)



-  Commercial
-  Campervans
-  All other vehicles

## 4. Direct counts of people: tally counts

4.1 Tally counts were maintained by the surveyors when on-site conducting interviews. These tallies reflected the number of people entering or leaving at the survey point. Of the surveyed locations the Skipwith Common car-park was the busiest location, with just under half the groups counted across all survey points and over half the people (the relatively high total people compared to other sites is skewed by a geology group at Skipwith Common). Skipwith Common was also the site with the most dogs recorded – a total of 28, equivalent to 1.8 dogs per hour. No people were recorded at all at North Duffield Carrs<sup>1</sup>. No dogs were recorded at Bank Island.

**Table 3: Tally data for numbers of groups, people, bicycles and dogs entering at each survey point. Entering means passing the surveyor heading into the site. Survey work was standard across all survey points (16 hours in total, 8 hours per day)**

	Survey point	01-Sep	02-Sep	04-Sep	05-Sep	07-Sep	08-Sep	Total	Total per hr
Groups	Bank Island		8	3				11	0.7
	N Duffield Carrs		0		0			0	0
	Skipwith Main CP					14	17	31	1.9
	Wheldrake Ings	18		8				26	1.6
	<b>Total</b>	<b>18</b>	<b>8</b>	<b>11</b>	<b>0</b>	<b>14</b>	<b>17</b>	<b>68</b>	<b>4.3</b>
Total people	Bank Island		18	6				24	1.5
	N Duffield Carrs		0		0			0	0
	Skipwith Main CP					21	60	81	5.1
	Wheldrake Ings	32		13				45	2.8
	<b>Total</b>	<b>32</b>	<b>18</b>	<b>19</b>	<b>0</b>	<b>21</b>	<b>60</b>	<b>150</b>	<b>9.4</b>
Bicycles	Bank Island		1					1	0.1
	N Duffield Carrs		0		0			0	0
	Skipwith Main CP					1	0	1	0.1
	Wheldrake Ings	0		0				0	0
	<b>Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0.1</b>
Total dogs	Bank Island		0	0				0	0
	N Duffield Carrs		0		0			0	0
	Skipwith Main CP					14	14	28	1.8
	Wheldrake Ings	5		1				6	0.4
	<b>Total</b>	<b>5</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>14</b>	<b>14</b>	<b>34</b>	<b>2.1</b>

<sup>1</sup> the surveyor did note a couple of vehicles briefly parking or turning round, however no one stepped out of their car and visited the site



## 5. Visitor interview results

### Overview

- 5.1 A total of 50 interviews were conducted (Table 4). No interviews were conducted at all at Duffield Carrs, where visitor use appears to be particularly low. 21 interviews (42%) were conducted at Skipwith.
- 5.2 Virtually all (92%) of interviews were with those who had undertaken a day trip/short visit directly from home that day; 2% of interviews included people staying away from home with friends/family and 4% were on holiday or staying in a second home/mobile home. One of the interviews did not fit into any of these categories and involved an interviewee part of a geological field trip that was taking place at Skipwith Common.

**Table 4: Number (%) of interviews by visit type and date (from Q1).**

	Bank Island	Wheldrake Ings	Skipwith Common	Total
Day trip/short visit, travelling directly from home that day	9 (18)	17 (34)	20 (40)	46 (92)
Day trip/short visit, staying away from home with friends/family	0 (0)	1 (2)	0 (0)	1 (2)
Staying away from home, e.g. second home, mobile home/on holiday	0 (0)	2 (4)	0 (0)	2 (4)
Other	0 (0)	1 (2)	0 (0)	0 (0)
<b>Total</b>	<b>9 (18)</b>	<b>20 (40)</b>	<b>21 (42)</b>	<b>50 (100)</b>

- 5.3 The average interview duration was 9.9 minutes, with interviews ranging in length from 4.3 minutes to 23.6 minutes. In 15 interviews (30%) the gender of the interviewee was female; 35 interviews (70%) were with men. Group size (i.e. the total number of people with the interviewee, including the interviewee), ranged from 1 to 35 (the latter the geology field trip). Around half (48%) of interviewees were visiting on their own (i.e. group size of 1). A total of 17 interviewees (34%) had at least one dog with them and the number of dogs with the interviewees ranged from 1-2. The total number of

people in all the interviewed groups was 116 accompanied by 33 dogs; giving a mean of 2.3 people and 0.7 dogs with each interviewee.

## Activities undertaken (Q2)

- 5.4 The most frequently recorded activity across all survey points was dog walking (32% of interviewees) (Figure 2). Walking (30% interviewees) and bird or wildlife watching (20%) were also frequently recorded activities.
- 5.5 There were markedly different activities recorded at the different survey points (Table 5). Dog walking was mostly at Skipwith Common rather than the Lower Derwent and no dog walkers were interviewed at all at Bank Island, where walkers (44% of interviewees there) predominated. None of the interviewees at Skipwith Common were visiting for bird or wildlife watching while this was the main activity for at least a third of interviewees at the Lower Derwent survey points. 'Other' activities (which did not fit with the standard categories on the questionnaire) accounted for 10% of interviewees overall and these included participating in a geology field trip, geocaching, fishing, stock-checking for the Yorkshire Wildlife Trust and participating in a non-native species survey.

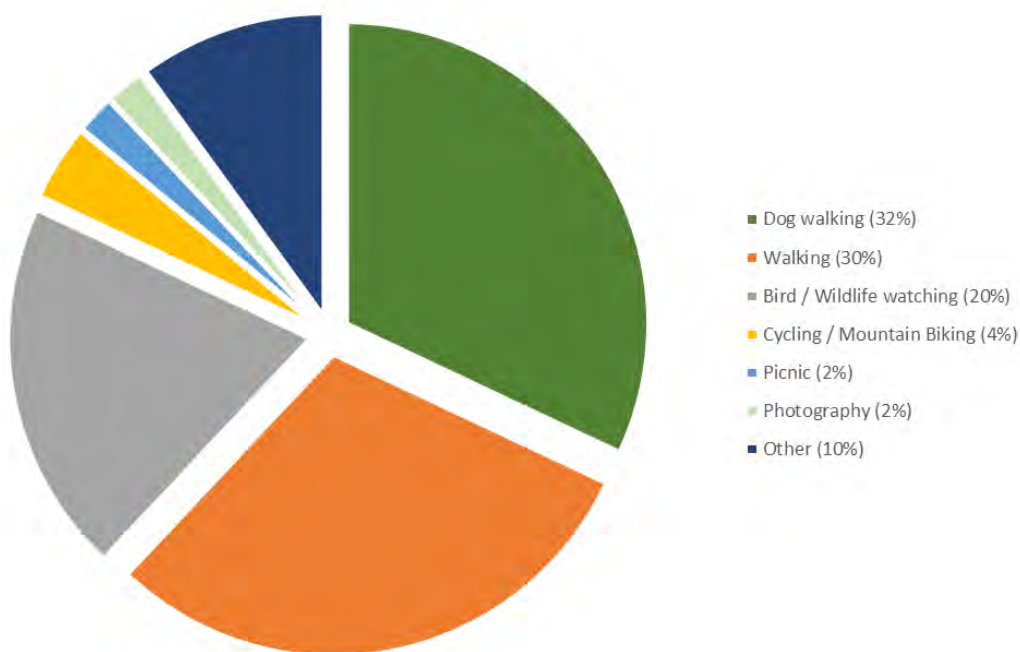


Figure 2: Activities undertaken (all 50 interviewees); from Q2.



Visitor surveys Lower Derwent and Skipwith  
Common

**Table 5: Number (column %) of interviewees by activity (from Q2) and survey point. The commonest activity in each column is shaded dark grey and the second most common pale grey.**

Activity	Bank Island	Wheldrake Ings	Skipwith Common	Total
Dog walking	0 (0)	3 (15)	13 (62)	16 (32)
Walking	4 (44)	6 (30)	5 (24)	15 (30)
Bird / Wildlife watching	3 (33)	7 (35)	0 (0)	10 (20)
Other	0 (0)	3 (15)	2 (10)	5 (10)
Cycling / Mountain Biking	1 (11)	0 (0)	1 (5)	2 (4)
Other	1 (11)	0 (0)	0 (0)	1 (2)
Photography	0 (0)	1 (5)	0 (0)	1 (2)
<b>Total</b>	<b>9 (100)</b>	<b>20 (100)</b>	<b>21 (100)</b>	<b>50 (100)</b>

## Temporal visiting patterns, frequency of visit, time of day etc. (Q3-7)

5.6 Around a third (32%) of all interviewees visited less than once a month (Table 6). Dog walkers were the group who visited the most frequently, with 19% visiting daily or most days.

**Table 6: Numbers (row %) of interviewees and frequency of visit (Q3) by activity. Grey shading reflects the highest value in each row.**

Activity	Daily	Most days (180+ visits)	1 to 3 times a week (40-180 visits)	2 to 3 times per month (15-40 visits)	Once a month (6-15 visits)	Less than once a month (2-5 visits)	First visit	Other	Total
Dog walking	2 (13)	1 (6)	5 (31)	1 (6)	1 (6)	4 (25)	2 (13)	0 (0)	16 (100)
Walking	0 (0)	2 (13)	0 (0)	1 (7)	1 (7)	8 (53)	3 (20)	0 (0)	15 (100)
Bird / Wildlife watching	0 (0)	2 (20)	2 (20)	1 (10)	1 (10)	1 (10)	1 (10)	2 (20)	10 (100)
Other	0 (0)	0 (0)	0 (0)	1 (20)	0 (0)	2 (40)	1 (20)	1 (20)	5 (100)
Cycling / Mountain Biking	0 (0)	0 (0)	0 (0)	1 (50)	0 (0)	1 (50)	0 (0)	0 (0)	2 (100)
Picnic	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
Photography	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)
<b>Total</b>	<b>2 (4)</b>	<b>5 (10)</b>	<b>7 (14)</b>	<b>6 (12)</b>	<b>3 (6)</b>	<b>16 (32)</b>	<b>8 (16)</b>	<b>3 (6)</b>	<b>50 (100)</b>

5.7 There were some differences between the Derwent Valley and Skipwith Common (Figure 3), with interviewees at Skipwith tending to visit more frequently (green shading reflects those visiting at least once a week) and more people on their first visit or ‘other’ visit frequency on the Lower Derwent valley. ‘Other’ responses here included one person visiting for the first time in 10 years and another visiting for the first time in many years.

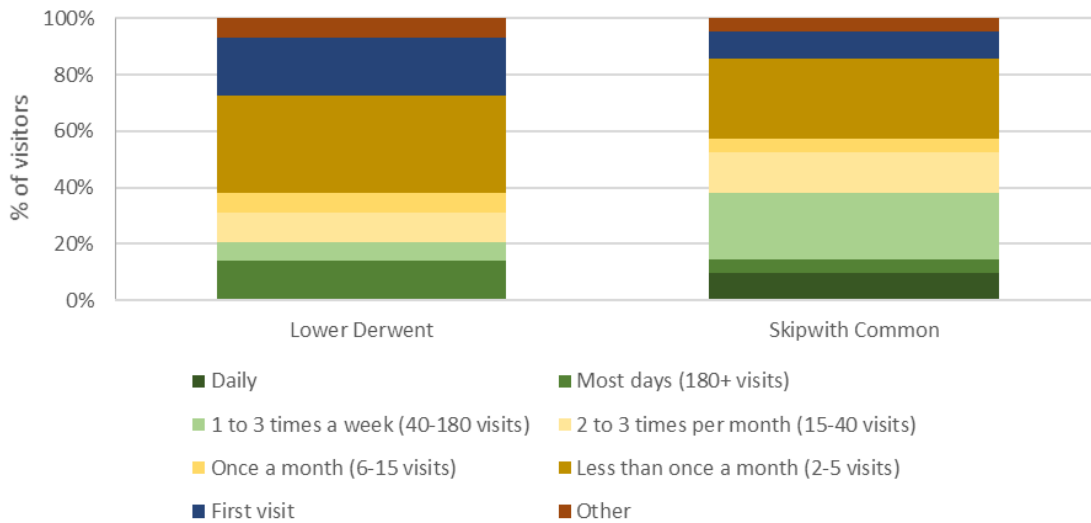


Figure 3: Frequency of visit (Q3) by European site.

5.8 Many visits were short, with 38% of interviewees spending less than an hour on the site (Table 7). The most common visit duration was 1-2 hours (40% interviewees). Comparing sites (Table 8), 1-2 hours was the most common visit duration at both the Lower Derwent and Skipwith Common, however the percentage visiting for a very short period (less than half an hour) was higher at Skipwith Common (24% of interviewees) compared to the Lower Derwent Valley (10% of interviewees).

Visitor surveys Lower Derwent and Skipwith  
Common

**Table 7: Numbers (row %) of interviewees and visit duration (Q4) by activity. Grey shading reflects the highest value in each row.**

Activity	Less than 30 minutes	Between 30 minutes and 1 hour	1-2 hours	2-3 hours	4 hours +	Total
Dog walking	3 (19)	7 (44)	6 (38)	0 (0)	0 (0)	16 (100)
Walking	5 (33)	2 (13)	7 (47)	1 (7)	0 (0)	15 (100)
Bird / Wildlife watching	0 (0)	1 (10)	3 (30)	5 (50)	1 (10)	10 (100)
Other	0 (0)	0 (0)	2 (40)	3 (60)	0 (0)	5 (100)
Cycling / Mountain Biking	0 (0)	0 (0)	2 (100)	0 (0)	0 (0)	2 (100)
Picnic	0 (0)	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
Photography	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
<b>Total</b>	<b>8 (16)</b>	<b>11 (22)</b>	<b>20 (40)</b>	<b>10 (20)</b>	<b>1 (2)</b>	<b>50 (100)</b>

**Table 8: Numbers (row %) of interviewees and visit duration (Q4) by site. Grey shading reflects the highest value in each row.**

European site	Less than 30 minutes	Between 30 minutes and 1 hour	1-2 hours	2-3 hours	4 hours +	Total
Lower Derwent	3 (10)	6 (21)	10 (34)	9 (31)	1 (3)	29 (100)
Skipwith Common	5 (24)	5 (24)	10 (48)	1 (5)	0 (0)	21 (100)
<b>Total</b>	<b>8 (16)</b>	<b>11 (22)</b>	<b>20 (40)</b>	<b>10 (20)</b>	<b>1 (2)</b>	<b>50 (100)</b>

5.9 Nearly a third (32%) of interviewees didn't tend to visit at a particular time of day and 16% were on their first visit and therefore didn't have a typical time of day they visited. For those who did tend to visit at a particular time, mornings were the commonest given response, with just over a quarter (28%) of interviewees visiting before 10am in the morning (Table 9).

**Table 9: Numbers (row %) of interviewees and time of day (Q5) that they tend to visit, by site. Grey shading reflects the highest value in each row. Interviewees could give multiple responses and the percentages, based on the number of interviews, can therefore total over 100.**

European site	Early morning (before 7am)	Late morning (7am - 10am)	Midday (10am - 2pm)	Early afternoon (2pm - 4 pm)	Late afternoon (4pm- 6pm)	Evening (after 6pm)	Varies / Don't know	First visit	Number interviewees
Lower Derwent	4 (14)	6 (21)	2 (7)	3 (10)	5 (17)	6 (21)	8 (28)	6 (21)	29 (100)
Skipwith Common	0 (0)	4 (19)	4 (19)	3 (14)	4 (19)	3 (14)	8 (38)	2 (10)	21 (100)
<b>Total</b>	<b>4 (8)</b>	<b>10 (20)</b>	<b>6 (12)</b>	<b>6 (12)</b>	<b>9 (18)</b>	<b>9 (18)</b>	<b>16 (32)</b>	<b>8 (16)</b>	<b>50 (100)</b>

V i s i t o r   s u r v e y s   L o w e r   D e r w e n t   a n d   S k i p w i t h  
C o m m o n

5.10 Most interviewees (44%) indicated that they visited equally all year round (Table 10), but this was particularly the case at Skipwith Common where 67% visited equally all year round. At the Lower Derwent survey points, while all year round was still the most common response, there was more evidence of particular times of year being a focus, for example 21% tending to visit more in the winter and 24% in the summer.

**Table 10: Numbers (row %) of interviewees and time of year (Q6) that they tend to visit. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value. Interviewees could give multiple responses and the percentages, based on the row totals, can therefore total over 100.**

Activity	Spring (Mar-May)	Summer (Jun-Aug)	Autumn (Sept-Nov)	Winter (Dec-Feb)	Equally all year	First visit	Total
Lower Derwent	5 (17)	7 (24)	4 (14)	6 (21)	8 (28)	7 (24)	29 (100)
Skipwith Common	3 (14)	3 (14)	3 (14)	1 (5)	14 (67)	2 (10)	21 (100)
<b>Total</b>	<b>8 (16)</b>	<b>10 (20)</b>	<b>7 (14)</b>	<b>7 (14)</b>	<b>22 (44)</b>	<b>9 (18)</b>	<b>50 (100)</b>

5.11 Nearly half (46%) of those interviewed had been visiting for at least 10 years (Table 11). There was little in the way of clear differences between sites or activities (Table 12). Those undertaking 'other' activities were the group with the highest percentage (80%) visiting more than 10 years.

**Table 11: Number (row %) of interviewees and length of time that they have been visiting (Q7) by site. Grey shading reflects the highest value in each row.**

Activity	First visit	less than or c. 6 months	less than or c. 1 year	less than or c. 3 years	less than or c. 5 years	less than or c. 10 years	more than 10 years	Total
Lower Derwent	6 (21)	1 (3)	2 (7)	0 (0)	2 (7)	4 (14)	14 (48)	29 (100)
Skipwith Common	2 (10)	0 (0)	0 (0)	2 (10)	3 (14)	5 (24)	9 (43)	21 (100)
<b>Total</b>	<b>8 (16)</b>	<b>1 (2)</b>	<b>2 (4)</b>	<b>2 (4)</b>	<b>5 (10)</b>	<b>9 (18)</b>	<b>23 (46)</b>	<b>50 (100)</b>

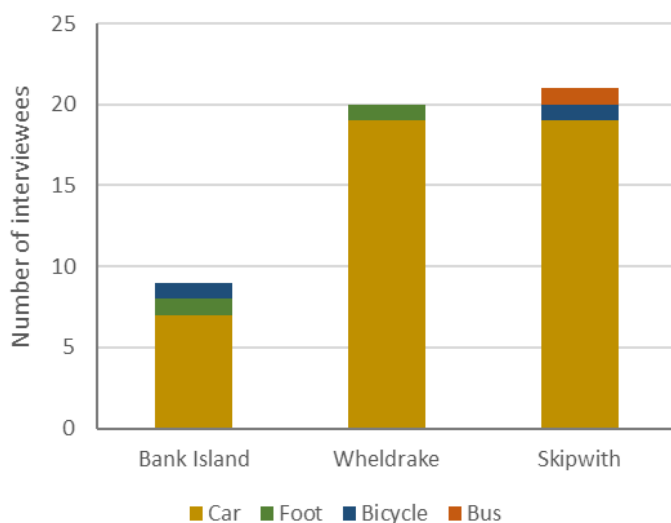
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**Table 12: Number (row %) of interviewees and length of time that they have been visiting (Q7) by activity. Grey shading reflects the highest value in each row.**

Activity	First visit	less than or c. 6 months	less than or c. 1 year	less than or c. 3 years	less than or c. 5 years	less than or c.10 years	more than 10 years	Total
Dog walking	2 (13)	0 (0)	1 (6)	2 (13)	2 (13)	2 (13)	7 (44)	16 (100)
Walking	3 (20)	1 (7)	0 (0)	0 (0)	1 (7)	5 (33)	5 (33)	15 (100)
Bird/Wildlife watching	1 (10)	0 (0)	1 (10)	0 (0)	1 (10)	1 (10)	6 (60)	10 (100)
Other	1 (20)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	4 (80)	5 (100)
Cycling / Mountain Biking	0 (0)	0 (0)	0 (0)	0 (0)	1 (50)	0 (0)	1 (50)	2 (100)
Picnic	1 (100)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)
Photography	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
<b>Total</b>	<b>8 (16)</b>	<b>1 (2)</b>	<b>2 (4)</b>	<b>2 (4)</b>	<b>5 (10)</b>	<b>9 (18)</b>	<b>23 (46)</b>	<b>50 (100)</b>

## Mode of transport (Q8)

5.12 Overall, most (90%) of interviewees had travelled by car, with only small numbers arriving on foot (4%), by bicycle (4%) or by bus (1%). The majority of survey effort was focussed at car-parks, however both Skipwith Common and the Lower Derwent valley have low levels of housing near the entry points and therefore few people within easy walking or cycling distance. Cars were the main mode of transport at all survey points (Figure 4). The interviewee that had travelled by bus was part of the geology fieldtrip at Skipwith Common and the bus was on hire rather than public transport.



**Figure 4: Numbers of interviewees by mode of transport (Q8) and survey point.**

- 5.13 Group size for those arriving by car ranged from 1 (i.e. the interviewee visiting on their own) to 4, and the mean car-occupancy was 1.8 people per vehicle for the Lower Derwent and 1.6 for Skipwith Common.

## Reasons for site choice (Q13)

- 5.14 Reasons for site are summarised in Figure 5. Interviewees were asked why they chose to visit the specific location where interviewed, rather than another local site, with answers categorised by the surveyor using pre-determined categories which were not shown to the interviewee. One main reason was identified, and multiple 'other' reasons could be recorded. Overall the scenery/variety of views was the most common given reason, cited by 42% of interviewees (across both the Lower Derwent and Skipwith survey points). Close to home was also important and given by 31%. Close to home was however very clearly the most common single main reason, with 14% of interviewees stating close to home was the single main reason for underpinning their choice of site.
- 5.15 There were some differences between the two European sites. Close to home featured much more strongly as a reason at Skipwith Common, where it was cited as frequently as the scenery/variety of views. Skipwith Common was chosen by 7 interviewees because it was good for the dog yet this reason was not recorded for the Lower Derwent sites. The particular wildlife interest at the Lower Derwent was a draw for many, and further details that were recorded highlighted species such as Osprey and Wood Sandpiper that visitors were keen to see.
- 5.16 25 interviewees (50%) gave other reasons for their choice, and these were varied, including recommendations on the Selby District website, recommendations on a geo-caching app, "for a survey", volunteering, passing en route to Selby Hospital, "free to fish", and for at least three interviewees there was an element of exploration, either exploring the local area, looking for somewhere to picnic etc. The geology group at Skipwith Common were (unsurprisingly) drawn by the geological interest of the site.

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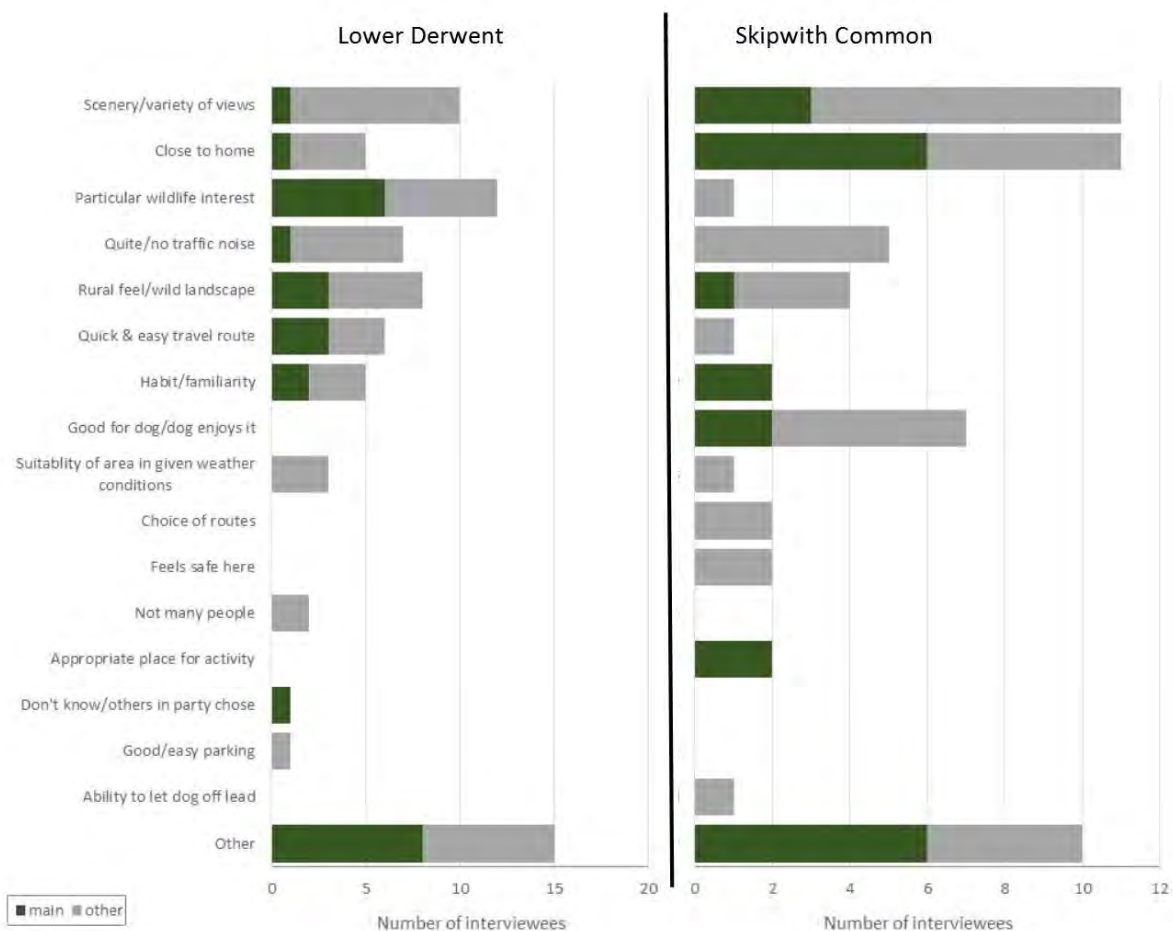


Figure 5: Reasons for site choice (Q13).

## Use of other sites (Q14-15)

5.17 It is to be expected that people will tend to visit a range of greenspace sites for recreation. Very few (4%) of interviewees stated that all their visits (for the activity they were undertaking when interviewed) took place at the site where interviewed (Table 13). There were some potential differences between European sites, with 34% of the interviewees at Skipwith indicated that at least three-quarters of their weekly visits (for the given activity) took place there. By contrast, at the Lower Derwent the figure was 13% of interviewees. At the Lower Derwent over half of interviewees (55%) indicated less than 25% of their visits were to the site – while for Skipwith the equivalent total was a third (33%) of interviewees. These results suggest slightly more faithful visitors at Skipwith Common.



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5.18 Other sites visited are listed in Table 15. The question asked the interviewee which one site they would have visited instead and a wide range of locations were listed, very few more than once. The table includes all named alternatives that could be attributed to a particular location.

**Table 13: Table 14: Number (row %) of interviewees and proportion of weekly visits (Q14) by European site. Grey shading reflects the highest two value in each row.**

European site	All take place here	75% or more	50-74%	25-49%	less than 25%	Not sure/don't know/first visit/no response	Total
Lower Derwent	1 (3)	3 (10)	3 (10)	1 (3)	16 (55)	5 (17)	29 (100)
Skipwith Common	1 (5)	6 (29)	0 (0)	4 (19)	7 (33)	3 (14)	21 (100)
<b>Total</b>	<b>2 (4)</b>	<b>9 (18)</b>	<b>3 (6)</b>	<b>5 (10)</b>	<b>23 (46)</b>	<b>8 (16)</b>	<b>50 (100)</b>

**Table 15: Other sites visited (Q15) by European site.**

Site name	Lower Derwent	Skipwith Common
Askham Bog	2	1
Balby		1
Bayford Common	1	
Bishops Wood	1	2
Blacktoft Sands	1	
Blackwoods	1	
Brayton Baff		1
Bubwith		1
Castle Howard	1	1
Dalby Forest	1	
Donnington	2	
Eastrington Ponds		1
Esrick Park Estate	3	
Filey		1
Flamborough Head	1	
Harrogate		1
Millington Dale		1
North Cave Wetlands	1	
North Duffield Carrs		1
Pocklington		1
River Foss	1	
Skipwith	1	
Strensall Common		1
Westfield	1	1

V i s i t o r   s u r v e y s   L o w e r   D e r w e n t   a n d   S k i p w i t h  
C o m m o n

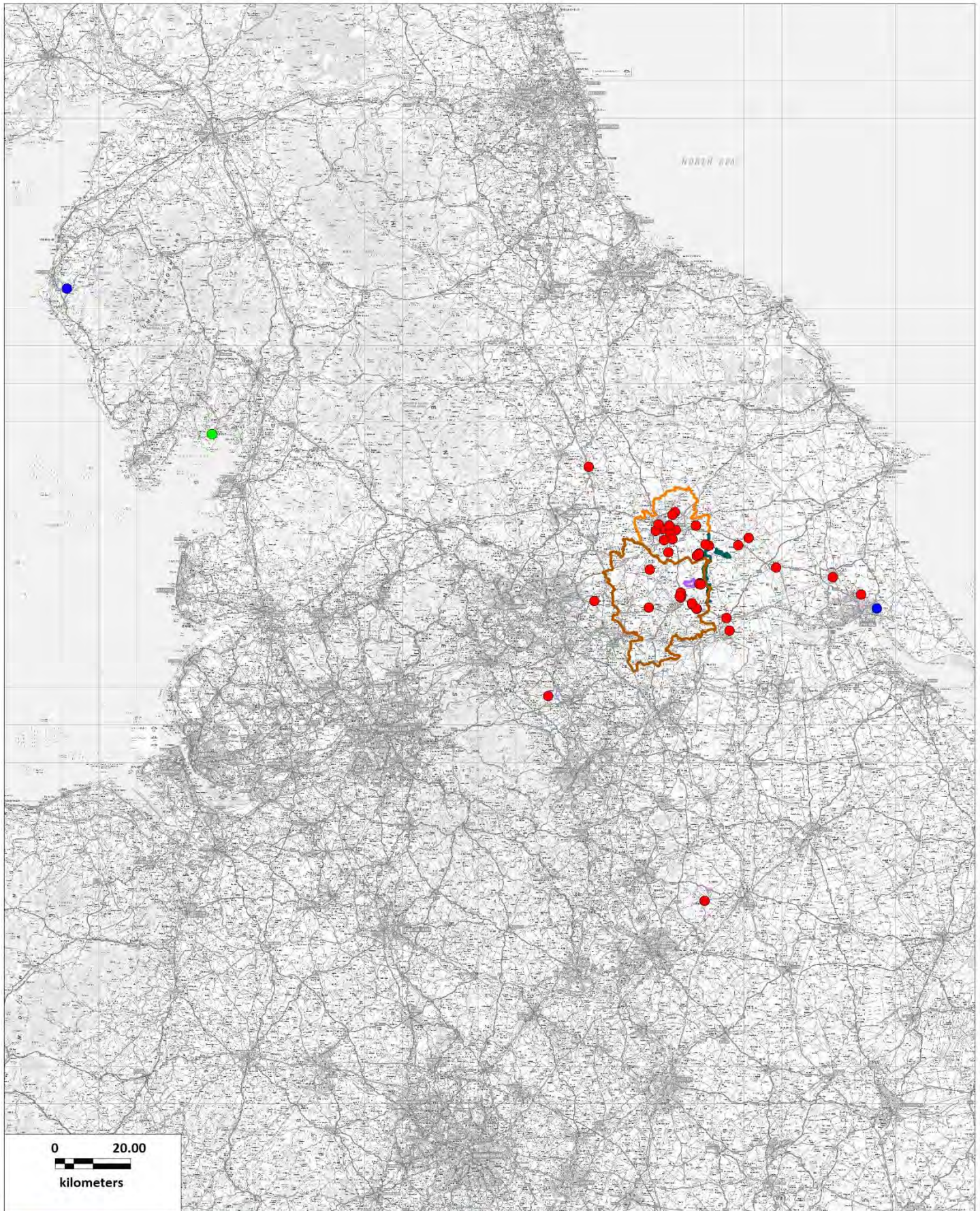
Site name	Lower Derwent	Skipwith Common
Wheldrake Ings	1	
Wheldrake Woods	2	
York		1
<b>Total</b>	<b>22</b>	<b>16</b>

## Visitor origins (Q18)

- 5.19 A total of 48 interviewee postcodes could be accurately mapped, with the full postcode given in the interview matching the standard national postcode database. A total of 2 (4%) of interviews were therefore not assigned to a home postcode.
- 5.20 Postcode data are mapped in Maps 4-7. Map 4 shows all visitor postcodes, and it can be seen that there they cover a wide area, including visitors from Cumbria and near Nottingham. Two of the more distant postcodes (from Hull and from Cumbria) reflected interviewees staying away from home, for example on holiday.
- 5.21 Map 5 shows the postcode data by survey point and the two relevant local authority boundaries are shown. 19 interviewee postcodes (40%) were within the City of York and these were mostly people interviewed at Wheldrake Ings (13 interviewees), with 3 interviewees from York at Bank Island and 3 at Skipwith Common). There were 14 interviewees (27%) from Selby District, and these were mainly interviewed at Skipwith Common where 12 interviewees were from Selby. Only 1 interviewee at both Wheldrake and Bank Island were from Selby District.
- 5.22 Maps 6 and 7 show a smaller geographic area (7 interviewee postcodes lie outside the area covered in the map). Map 6 shows postcodes by activity, and a notable cluster of local dog walkers is evident around Skipwith Common, including residents of Barlby, Osgodby, North Duffield, Cliffe and Hemingborough. Map 7 shows the same data, with shading reflecting frequency of visit. This highlights how little very regular use of the two sites there is, with for example daily visitors to Skipwith originating from North Duffield and Barlby only. None of the cluster of interviewees at Wheldrake who visit the Lower Derwent visit daily and only 2 visit most days.

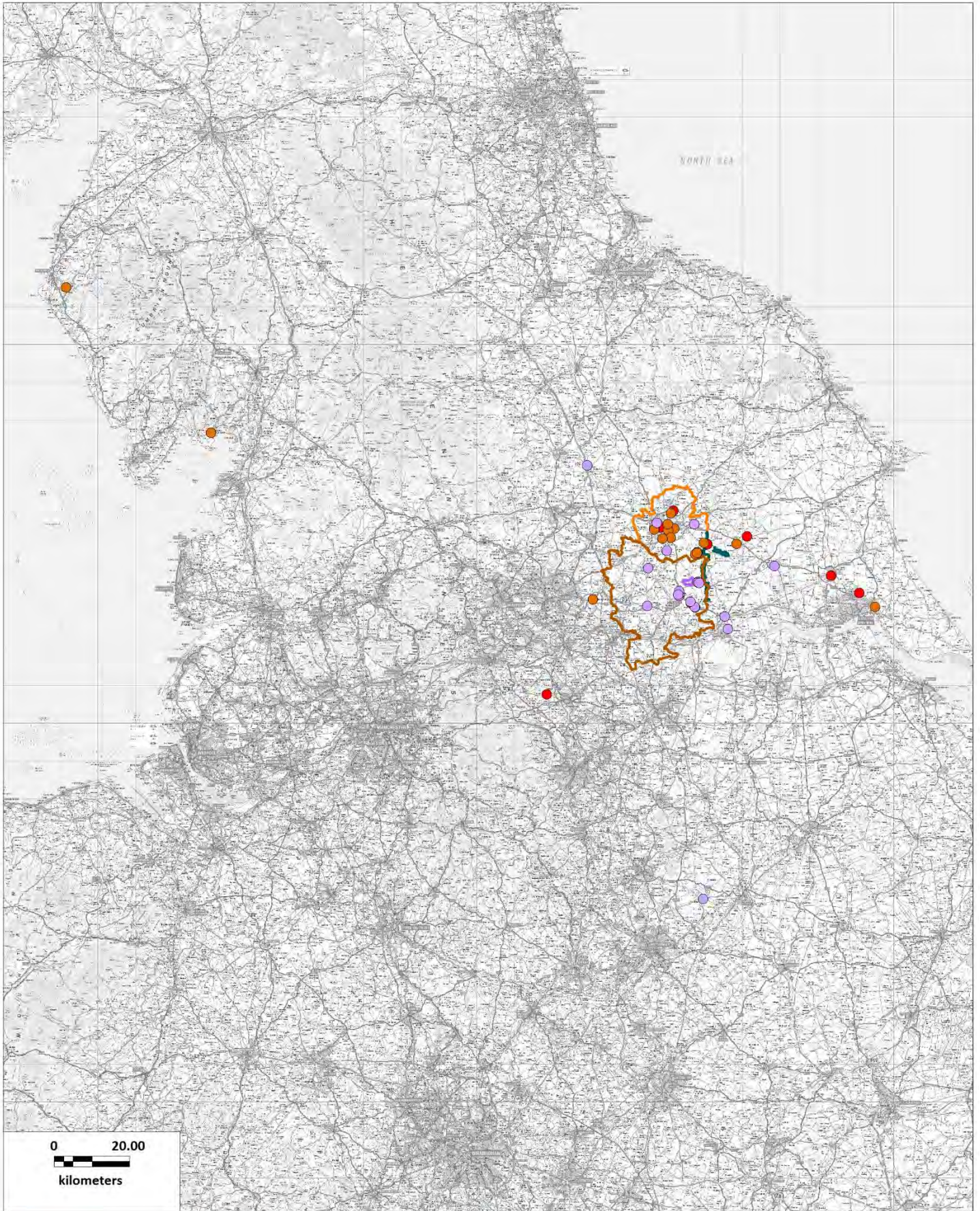









Map 4: All postcodes by visitor type



	City of York		Lower Derwent Valley SPA		Day trip/short visit and travelled directly from home today	(44)
	Selby		Skipwith Common SAC		Day trip/short visit & staying away from home with friends or family	(1)
					Staying away from home, e.g. second home, mobile home or on holiday	(2)
					Other	(1)

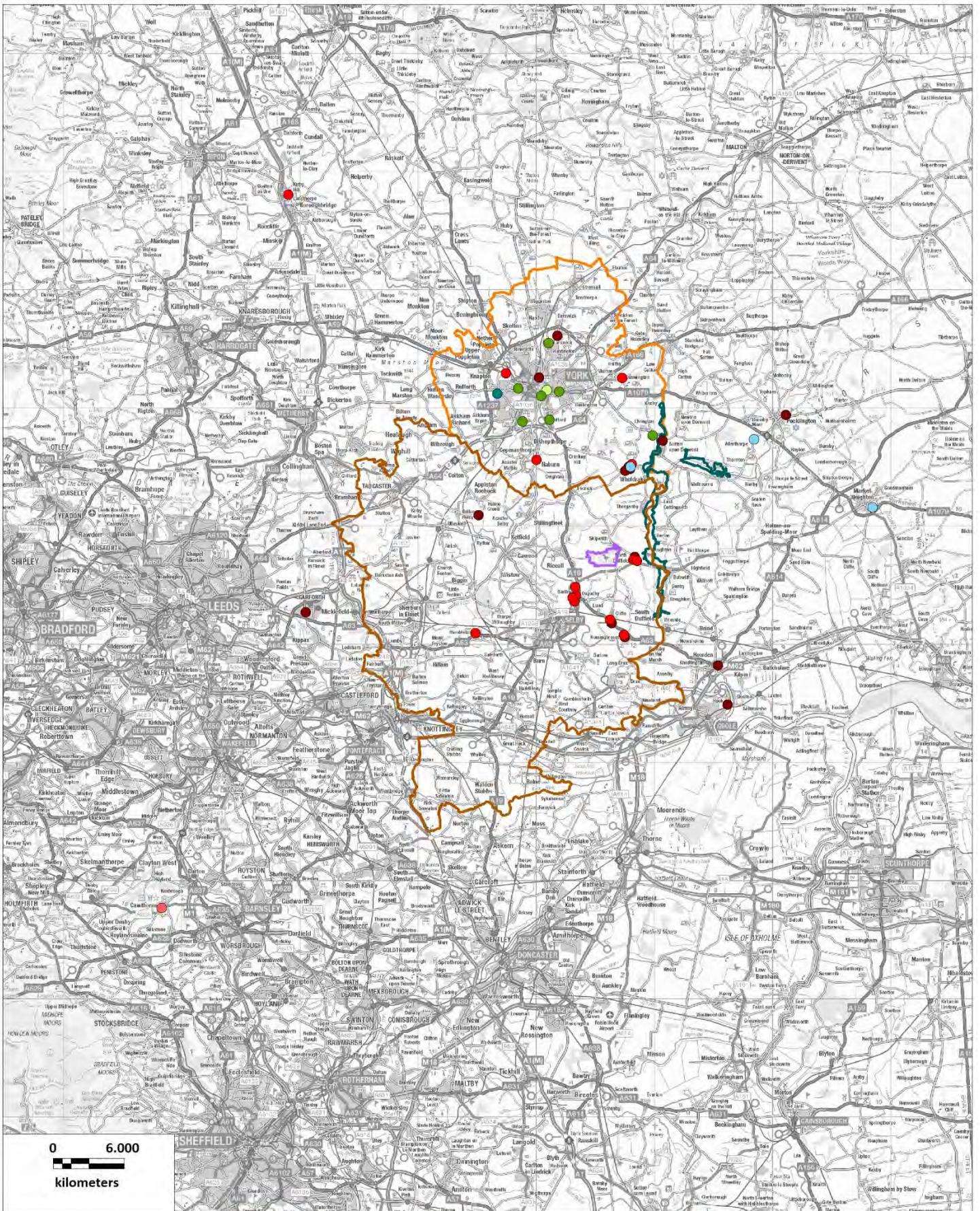




- |   |              |   |                          |   |                      |
|---|--------------|---|--------------------------|---|----------------------|
|  | City of York |  | Lower Derwent Valley SPA |  | Bank Island (9)      |
|  | Selby        |  | Skipwith Common SAC      |  | Wheldrake Ings (19)  |
|   |              |   |                          |  | Skipwith Common (20) |



Map 6: Postcodes by activity (note 7 postcodes outside map window)

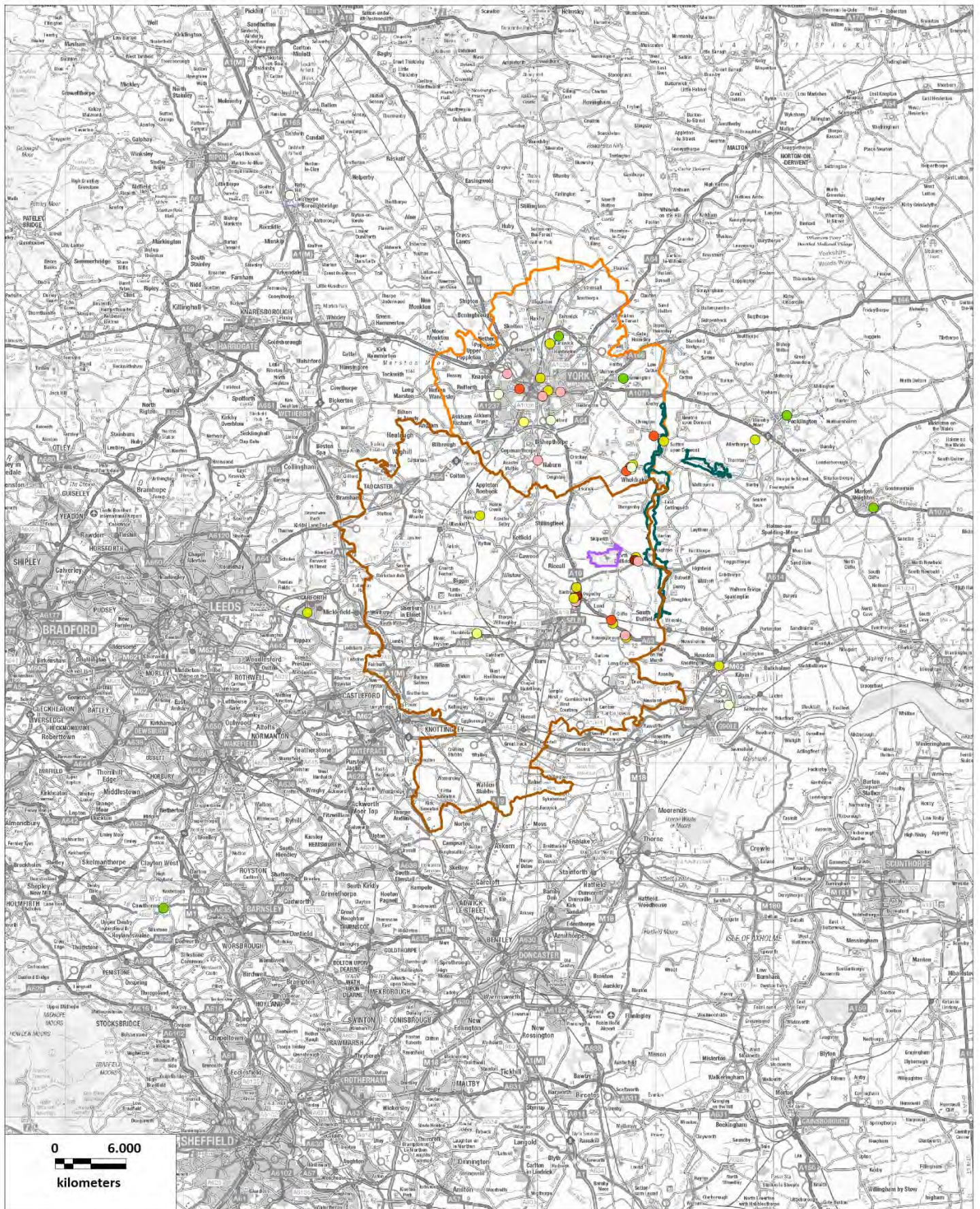


	City of York		Lower Derwent Valley SPA		Bird / Wildlife watching	(10)
	Selby		Skipwith Common SAC		Cycling / Mountain Biking	(1)
					Dog walking	(15)
					Other	(5)
					Photography	(1)
					Picnic	(1)
					Walking	(15)

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Map 7: Postcodes by frequency of visit (note 7 postcodes outside map window)



- Daily (2)
- Most days (180+ visits) (5)
- 1 to 3 times a week (40-180 visits) (7)
- 2 to 3 times per month (15-40 visits) (5)
- Once a month (6-15 visits) (3)
- Less than once a month (2-5 visits) (16)
- Other (3)
- First visit (7)

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- 5.23 The straight-line distance ('as the crow-flies') from the interviewee's home postcode to the survey point was calculated for each of the 48 interviewee postcodes and the data are summarised in Table 16. It can be seen that across all the data the mean distance was 20.8km and the median was 11.7km; i.e. 50% of interviewees had come from a radius of 11.7km around the survey points. The mean is so much higher than the median as there are a few large values that skew the data. The third quartile (75<sup>th</sup> percentile) was 15.5km; 75% of interviewees lived within this distance of the survey points.
- 5.24 Looking at particular subsets of the data, given in Table 16, it can be seen that if holiday makers and those staying with friends and family are excluded (i.e. the data are limited to day visitors from home only), the median is much lower at 10.9km and 75% of visitors came from a radius of 13.9km. Dog walkers are local, with a median distance of 5.7km. Comparing between survey points, Skipwith Common (median 8.8km) is lower than Wheldrake Ings (median 11.2km) and Bank Island (median 13.2km).

**Table 16: Summary statistics for the straight-line distance between the home postcode and survey point for different groups of interviewees. Shading and dark lines separate different types of grouping. N is the sample size (number of valid postcodes) and Q3 is the 75<sup>th</sup> percentile.**

Variable/type of interviewee	N	Distance (km)				
		Mean (+ 1SE)	Min	Median	Q3	Maximum
All interviewees with valid postcode	48	20.78 (+ 4.81)	1.39	11.69	15.53	181.83
Day visitors from home only	44	12.53 (+ 1.78)	1.39	10.87	13.85	55.00
Dog walkers	15	12.24 (+ 3.61)	1.39	5.66	14.80	47.47
Wheldrake Ings	19	26.83 (+ 11.03)	1.58	11.16	14.42	181.83
Bank Island	9	22.04 (+ 5.89)	2.99	13.23	38.78	55.00
Skipwith Common	20	14.49 (+ 4.02)	1.39	8.80	15.53	84.07

- 5.25 In Table 17 we show the number of interviewees within different distance bands (concentric rings) drawn around the outside of the two European sites<sup>2</sup>. We also give the number of residential properties in each band, extracted from 2017 postcode data. Clearly the home postcodes of interviewees will reflect where there are houses present and in general it would be expected that people who live further away would visit less. In

<sup>2</sup> The distance bands were drawn separately around Skipwith Common SAC and the Lower Derwent SPA

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Table 17 we also calculate the number of visits per residential property. The data are summarised visually in Figure 6.

- 5.26 It can be seen that the amount of housing around the Lower Derwent SPA rises steadily across successive distance bands, and the high levels of housing in the outer bands (beyond 8km) reflect the location of York and Selby. The SPA is long and thin and the buffers extend over a wide area. Compared to Skipwith Common (note the different axis scales in the Figure) the Lower Derwent has many more houses within a kilometre, this is due to the scale of the site and a range of small settlements spread over a wide area, including Thorganby, Melbourne, Wheldrake and Bubwith. Around Skipwith there are relatively few properties in the initial bands and the marked peak between 5 and 6km reflects the location of Selby.
- 5.27 The interviews per property are low or zero for both sites in the first distance band. This is likely to be a reflection of the low amount of housing in the first band and the location of that housing in relation to the survey points. The plots suggest a decline in visit rate with distance but there is some considerable scatter, potentially an artefact of the small sample sizes. We have fitted the same trendline to both graphs, with the fitted line commencing after 1km. These plots suggest people living within 5km are much more likely to visit than those further away and that beyond 5km there is little difference in visit rate with distance, i.e. we would anticipate that a fixed amount of development at 5km, 10km or 15km would have a relatively similar effect on visit rates.

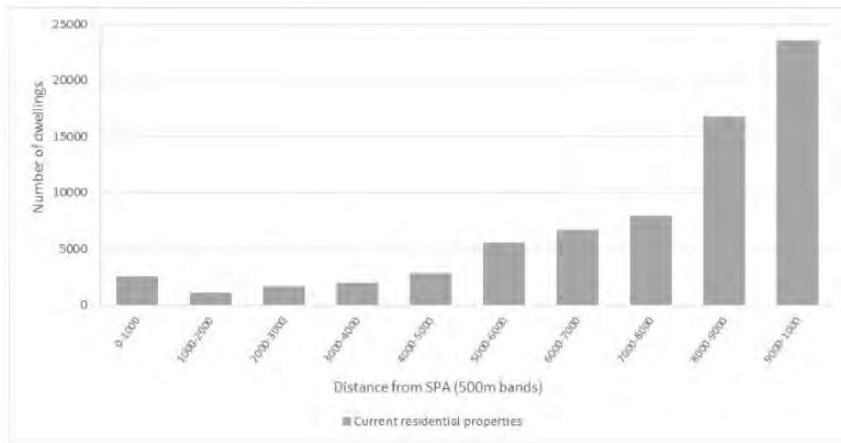
**Table 17: Number of current residential properties and interviewees by 500m distance band.**

Distance from SPA/SAC	Lower Derwent			Skipwith		
	Number of interviewees	Number of residential properties	Interviews per property	Number of interviewees	Number of residential properties	Interviews per property
0-1000	2	2617	0.00076	0	181	0
1000-2000	5	1111	0.0045	3	869	0.00345
2000-3000	0	1674	0	2	1858	0.00108
3000-4000	2	2038	0.00098	2	906	0.00221
4000-5000	0	2805	0	1	1759	0.00057
5000-6000	0	5588	0	1	6071	0.00016
6000-7000	2	6676	0.0003	1	5419	0.00018
7000-8000	0	7956	0	0	1900	0
8000-9000	2	16814	0.00012	1	1943	0.00051
9000-1000	1	23557	0.00004	1	2261	0.00044



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Lower Derwent SPA



Skipwith Common SAC

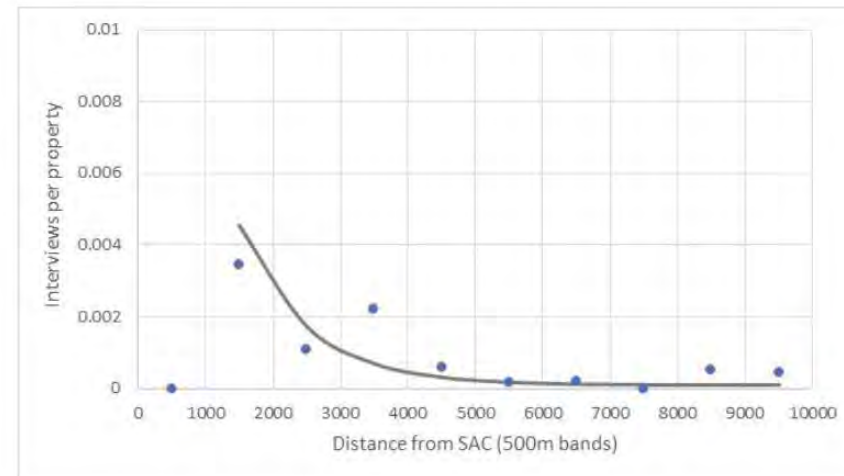
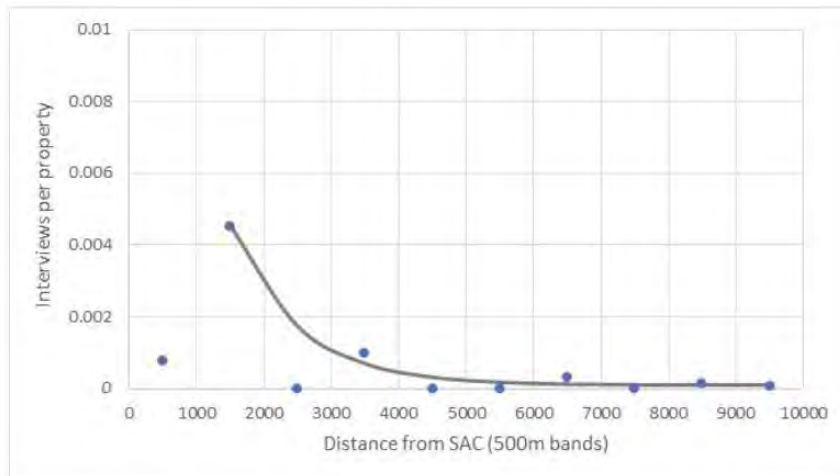
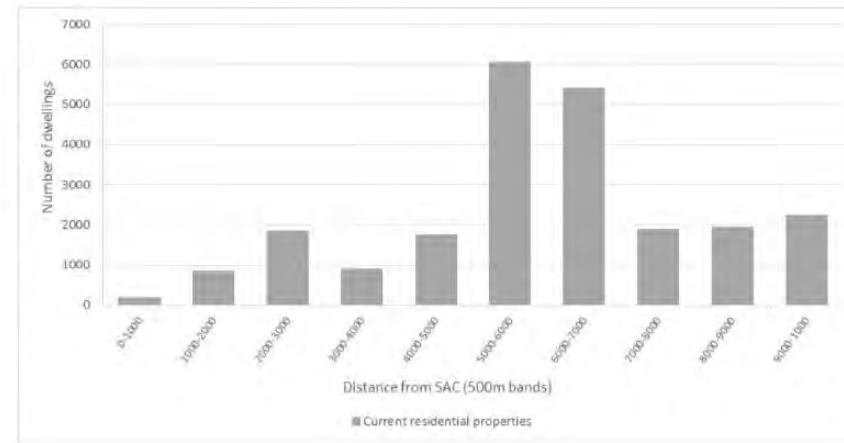
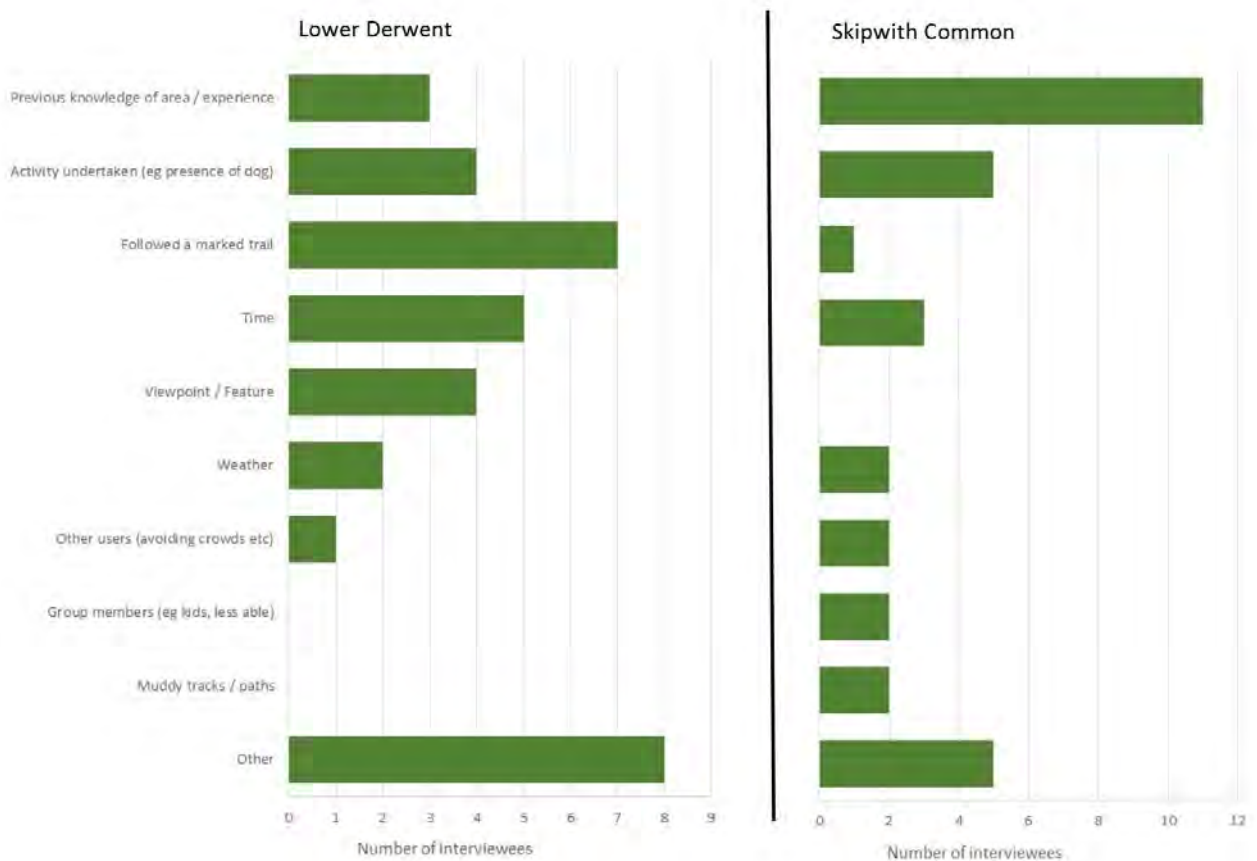


Figure 6: Levels of current housing per 1km distance band (upper graphs) and interviews per property in relation to distance (lower graphs). Interviews per property is calculated by dividing the number of interviewees who originated in each 1km band by the number of residential properties in the band. Trendline fitted manually by eye. Lower Derwent  $Y=0.02e^{-0.001x} + 0.0001$ .  $r^2 = 0.887$ ; Skipwith Common:  $Y=0.02e^{-0.001x} + 0.0001$ .  $r^2 = 0.852$ .

## Visitor routes during their visit (Q9-12)

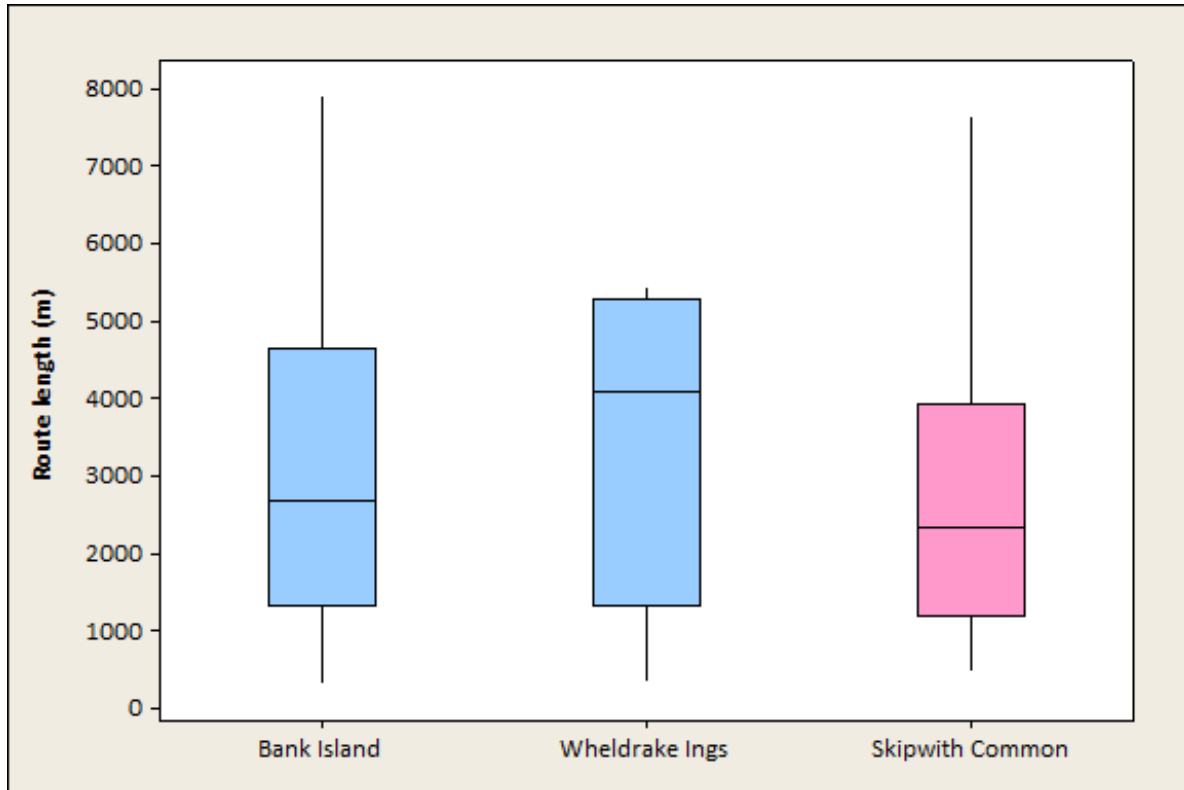
- 5.28 For 37 interviewees (74%) the route they took was either reflective of their normal route, they were on their first visit or didn't have a typical route (Q9). Of those whose route was not reflective of a typical route, 10 interviewees (20%) indicated it was much shorter than normal and 3 interviewees (6%) indicated their route was much longer than normal.
- 5.29 Around a third (16 interviewees, 32%) of those interviewed were following a marked trail, this was particularly the case at Wheldrake Ings where 10 interviewees (i.e. 50% of those interviewed there) were following a marked route. Across all sites 6 interviewees (12%) were unsure and 28 interviewees (56%) were not following a marked route.
- 5.30 A range of factors influenced the interviewees' choice of routes (Figure 7). Across all sites, previous knowledge/experience was the most commonly cited reason, however it was particularly cited at Skipwith Common given by 11 interviewees. Following a marked trail and viewpoints/features were particularly important at the Lower Derwent compared to Skipwith. Other factors included the most direct route to the hides, the presence of particular species and the "time of year meaning it was allowed to walk on the grass" on the Lower Derwent. At Skipwith Common other reasons cited included doing a circular route, there being "no tarmac on the other path" and the location of geo-caches. For a few interviewees at both sites other reasons included just wanting to explore, an element of just following a path to see where it went, reflecting the relatively high proportion of infrequent and first-time visitors.

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**Figure 7: Factors influencing choice of route (Q12). Note interviewees could give multiple responses.**

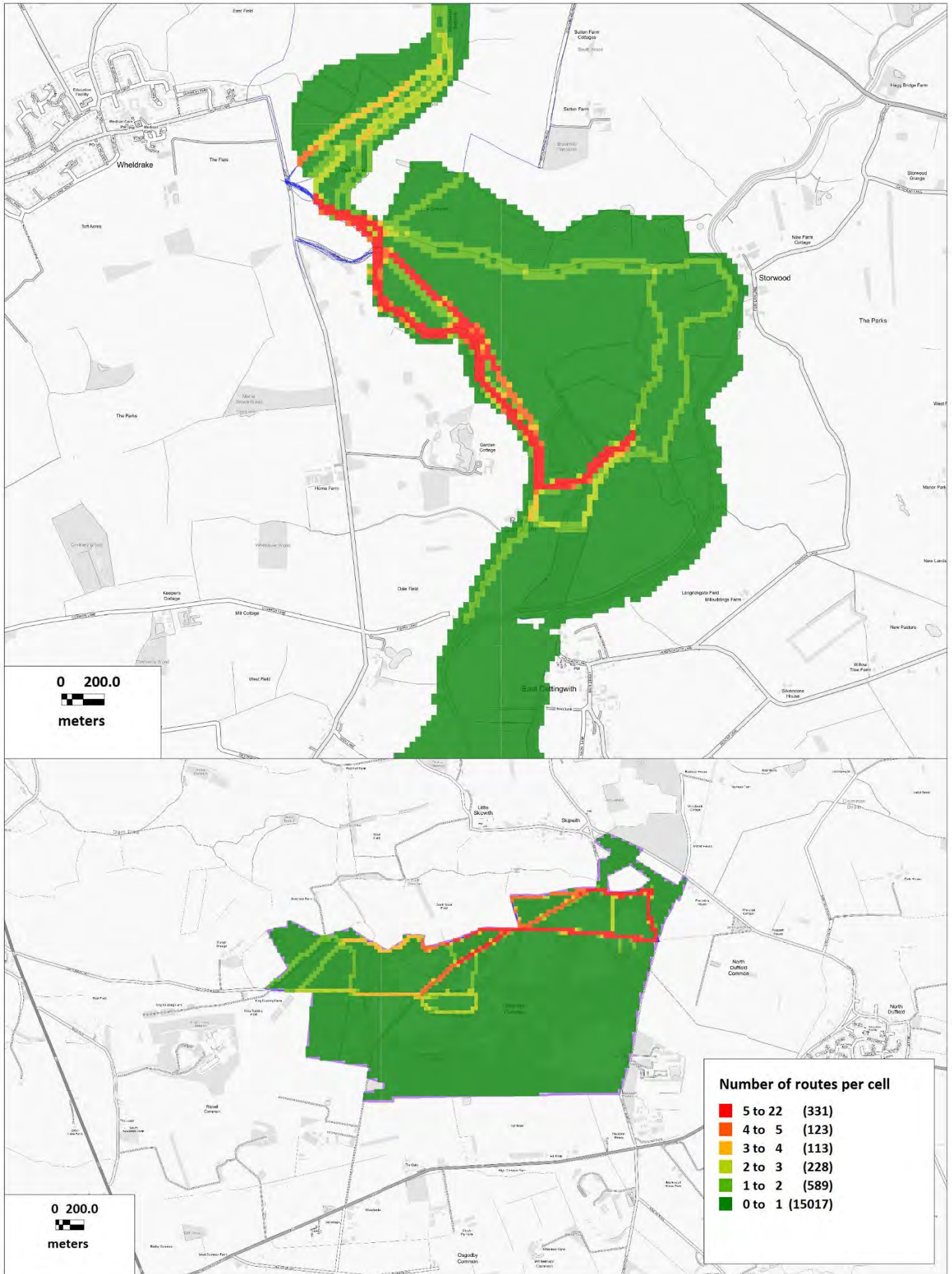
5.31 A total of 50 routes were mapped, with a line showing the route taken by the interviewee. The mean route length as mapped was 3.04km ( $\pm$  1SE of 0.28km), with a median of 2.5km. Routes ranged from 314m to 7.91km. Route length data are summarised by survey point in Figure 8. The median route length was highest at Wheldrake Ings (4.10km) and lowest at Skipwith Common (2.34km), the differences were not however significant (Kruskal-Wallis  $H=1.17$ , 2 d.f.,  $p=0.557$ ).



**Figure 8: Box plot showing route lengths for all interviewees at each survey point. Blue shading reflects the two Lower Derwent sites. Horizontal lines show the median, boxes show the inter-quartile range and whiskers reflect the limit of the data.**

- 5.32 The mapped routes are shown in Map 8, where we have shown route density within the two European sites based on a 25m grid. It is often challenging for interviewees to describe where they have walked, even if shown a map and the routes are therefore approximate but give a feel for how visitors use each site. We have summarised them using the 25m grid as a way of highlighting areas with the most use and broadly indicating where the most footfall (of the interviewees) occurs. At Bank Island and Wheldrake Ings the data show people moving along the river between the two survey points and at Wheldrake Ings the route to the hides is the key focus, with some visitors following the river bank and others walking directly across the field.
- 5.33 At Skipwith the routes walked largely reflect the marked routes, including the 'Hidden Archeology' route and the Bombs and Lizards route that includes the Bomb Bays loop.

Map 8: Interviewee routes on 25m grid





## Comments/views on recreation management (Q16-17)

5.35 The last part of the questionnaire included free text boxes for the surveyors to log any changes interviewees would like to see regarding how the site is managed for recreation and people (Q16). The subsequent question asked for any further comments or feedback about the interviewee's visit (Q17). All comments are listed in Appendix 2 (Q16) and Appendix 3 (Q17) and we summarise a selection of themes or particular comments below, by survey point.

5.36 Bank Island:

- 2 interviewees suggested they would like to see a café and another stated they would not like to see it commercialised or have a café
- 1 interviewee commented that with native corncrakes the site should have a higher profile
- 1 interviewee commented that they would like to see water in pools for longer in the summer

5.37 Wheldrake Ings:

- 4 interviewees liked the site as it was and appreciated the quiet
- 2 interviewees commented they would like to be able to walk dogs on the riverside path
- 2 interviewees wanted better access to the river or views of the river. One of these wanted access to fish
- 2 interviewees commented that toilets would be good
- 1 interviewee would like to see more hides and another commented that they would like to be able to get closer to the hides by car

5.38 Skipwith Common:

- 6 interviewees commented on parking/vehicle access, mostly positively with interviewees clearly appreciating the ability to park in different locations and access parts of the site by car; 2 interviewees commented that car-parks were easy to miss.
- 4 interviewees commented negatively about dog-related issues, 2 wanting to see more clearing up of mess/bins and 1 commenting on issues with livestock.
- 1 interviewee suggested they would like to see a food truck in the summer
- 1 interviewee liked "seeing the livestock around"
- 1 interviewee commented the site was busier with too many people visiting now

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- 3 interviewees suggested more for children – with two suggesting more interpretation on history etc. and 1 suggesting a wild play area with ropes.



## 6. Discussion and implications

- 6.1 This report was commissioned to further understand the recreational use of Skipwith Common and the Lower Derwent and to consider implications for the European site interest as a result housing development and an increased local population.
- 6.2 The results show that the two sites are used for a variety of recreational activities, but the data suggest relatively low levels of use. There were some differences between the Lower Derwent and Skipwith Common.
- 6.3 On the Lower Derwent the car counts covered a number of different dates and counts were generally low. The tally data and the number of interviews collected both point to relatively few people visiting; no interviews were conducted at one car-park over 16 hours in which a surveyor was present. The number of dogs and dog walkers recorded on the Lower Derwent sites were particularly low and a high proportion of visitors had come from a wide area, drawn by specific wildlife interest. In general, we would potentially expect such visitors to be aware of the nature conservation issues and keen to use the hides and marked trails. The SPA is relatively rural, without lots of fringing urban development and the number of entry points to the SPA is limited. The entry points themselves are typically well managed nature reserves, promoted as such and not likely to draw high volumes of people for casual recreation, daily dog walks, running etc.
- 6.4 At Skipwith Common there were also relatively low levels of access recorded. The site is relatively tucked away and the car-parks not necessarily easy to find. The interview data did however– in contrast to the Lower Derwent sites – show use by local residents for dog walking, but the interviews seemed to pick up relatively few very regular visitors. Out of the 21 interviewees at the site, 2 visited daily and 1 most days. This, combined with the housing data (see Figure 6) would suggest that the site does not necessarily have a large pool of local residents who visit on a very frequent basis

### Potential issues from access

- 6.5 There are a range of ways in which recreation access at the different sites may have an impact on the nature conservation interest. These are summarised in Table 18.

**Table 18: Summary of mechanisms by which recreational access may affect the European site interest, drawing from discussions with relevant land managers, site visits and literature on recreation impacts (e.g. Lowen *et al.* 2008; Liley *et al.* 2010)**

Potential issues	Lower Derwent SPA	Lower Derwent SAC	Lower Derwent Ramsar	Skipwith Common SAC
Disturbance to wintering waterbirds	✓		✓	
Disturbance to breeding Shoveler	✓			
Disturbance to otters		✓		
Conflicts with grazing management through dogs off-leads, disturbance to livestock, gates left open etc.	✓	✓	✓	✓
Nutrient enrichment (dog fouling)		✓	✓	✓
Trampling (leading to vegetation wear, erosion etc.)		✓	✓	✓
Damage to infrastructure, from wear & tear, vandalism etc.	✓	✓	✓	
Contamination of pools (e.g. from dogs)				✓

6.6 Recreation is raised as an issue in Natural England's Site Improvement Plan for both sites, and these plans raise areas of particular concern. For the Lower Derwent Valley<sup>3</sup>, public access/disturbance is considered a potential threat to the site rather than a current pressure and the plan highlights that public access along Public and non-Public Rights of Way (particularly flood banks) is causing increasing disturbance to birds. For Skipwith Common<sup>4</sup>, public access and disturbance is listed as a current pressure and ranked first among all the issues listed for the site. The report highlights that most of the Common is access land, with large numbers of visitors, many with dogs. Uncontrolled dogs affect site management through stock worrying and loss of stock to dog attacks. This has the knock-on effect of threatening future grazing management. If the site was unable to be grazed this would adversely affect the wet and dry heath communities.

6.7 Clearly both sites are potentially vulnerable to recreation pressure and the issues are slightly different. On the Lower Derwent Valley concerns about future recreation from local development will relate to people straying from rights of way, following banks or other potential routes that bring them

<sup>3</sup> See [Natural England website](#) for details

<sup>4</sup> See [Natural England website](#) for details

close to the areas important for birds. Parking is quite limited and the main access points are managed as nature reserves and promoted as such. The visitor data presented here would suggest there is relatively little cause for concern from recreation, however it is important to recognise that the surveys took place when the sensitive wildlife features are not necessarily present. Were the surveys to be undertaken in mid-winter (when the valley is flooded) or spring/summer there may be different patterns of use.

6.8 Relatively few local residents are likely to be keen wildlife watchers but significant amounts of housing in the wider catchment of the site (say approximately 15km based on the 75<sup>th</sup> percentile figure for Wheldrake Ings in Table 16) may result in more use by birders and other naturalists. As such concerns are likely to be relatively minimal and low key. Long term solutions to ensuring any impacts are contained will relate to:

- Ensuring access off Public Rights of Way is restricted through barriers, fences and signage. This could simply involve reactive approaches to restrict any new routes or desire lines if/when they appear.
- Screening any existing public rights of way where there is a risk of disturbance causing problems. Screening could involve scrub, banks or reed screens/fencing etc.
- Maintaining the existing infrastructure for wildlife watchers, e.g. hides and paths such that they can accommodate for the numbers of visitors and minimise impacts.

6.9 At Skipwith Common the concerns in particular relate to dog walking and dogs off leads. There is also an area of bike jumps and mounded earth near the bomb bays loop which suggests use by mountain bikes/BMX and this could be of concern if it spreads more widely or causes damage.

6.10 There are numerous parking locations and a range of entry points, however much of the site is quite wet and access is therefore limited and there appears (e.g. Map 8) to be little access to the south-eastern corner of the site. While we recorded low levels of use, it is important however to note that there was some rain while the interviews took place, and this may have deterred some visitors. We chose to focus on one survey point at the main car-park on the Cornelius Causeway, and there may have been merit in including the King Rudding Lane car-park in addition, as the car-park count data showed this to be used on occasion (with cars present on 2 of the 6 counts). Our survey recorded no postcodes from residents of Riccall and these may have been picked up from King Rudding Lane.

6.11 Dog walking is the activity of particular concern at Skipwith Common. Dog walkers interviewed at the Common had come from Balby (4), North Duffield (2), Hambleton (1), Hemmingbrough (1), Cliffe (1), Naburn (1), Dunnington (1), York (1) and Boroughbridge (1), with those who lived closer tending to visit more frequently. The site clearly has a wide potential draw for dog walkers and significant development in the local area could create greater pressure on the site. Long term options to manage that pressure could involve:

- Greater promotion of the dog walker ('Canine') car-park on the Cornelius Causeway (this provides walking routes away from the SAC) or improvements to make this more appealing to dog walkers; car-park counts recorded just one car here over the 6 counts;
- Greater wardening presence, engaging with dog walkers, encouraging them to keep dogs on leads and pick-up etc., particularly at times when livestock have just been brought onto the site or other vulnerable times;
- Low-key events aimed at local dog walkers, for example guided walks for dog walkers and their dogs (potentially showing new routes or promoting areas such as around the Canine car-park), meet and greet events etc.
- Developing volunteer ambassadors or similar – ideally local dog walkers – who can help with peer pressure to promote responsible dog ownership.
- Provision of greenspace away from Skipwith, targeted for dog walkers. This will need to replicate the experience at Skipwith Common, for example the median route length of 2.3km. Such an approach is likely more relevant at Skipwith Common compared to the Lower Derwent Valley, due to the particular issues with dogs and grazing. The location of any new space in relation to development and how the site is promoted will be critical to its effectiveness.

6.12 At both the Lower Derwent and Skipwith Common long-term monitoring of visitor numbers and recreation use is recommended. Car-park counts could form the basis of such monitoring and the data here provide a baseline. Future visitor survey work, including car-park counts would perhaps best be targeted to include the winter period at the Lower Derwent Valley. The current results are adequate to inform HRA work for the relevant Local Plans: the results suggest little use of the valley besides those visiting to see wildlife. This pattern is unlikely to change in the winter, when access is potentially harder and more challenging. Nonetheless, access patterns can

change over time and it is clear from the comments from visitors that there is some desire for further facilities – for example increased commercialisation, café, toilets, visitor centre and different access (e.g. dogs at Wheldrake). Over time these pressures may grow and any change in the facilities may change how visitors use the two sites. Monitoring will allow checks at Local Plan review.

### Key findings in relation to relevant HRAs

- 6.13 Drawing from the above, we would suggest that there is the potential for Likely Significant Effects from development for both the Lower Derwent Valley SPA and Skipwith Common SAC. At plan-level HRA the results presented here should be sufficient to rule out adverse effects on integrity for both sites with respect to recreation for any single development alone, unless it is of a large scale and within close proximity of the relevant sites (within 1km). It should also be possible to rule out adverse effects on integrity relating to recreation pressure, for the quantum of development as a whole (i.e. in-combination), however it is recommended that checks are in place to make sure necessary monitoring and review are included within the Plans. Such monitoring will need to include targets such that, should particular changes be recorded, necessary mitigation and avoidance measures (as suggested here) can be established before any harm to the European sites. We suggest that Skipwith Common is the more vulnerable of the two sites, due to the particular issues relating to dogs of leads and grazing.

## Appendix 1: Questionnaire



Good morning/afternoon. I am conducting a visitor survey on behalf of City of York Council and Selby District Council, who are interested in gathering visitor's views about this site and how they use it. Can you spare me a few minutes please?

Q1 ...

- Are you on a day trip/short visit and have travelled directly from your home today... *if no*
- Are you on a short trip/short visit & staying away from home with friends or family ... *if no*
- Are you staying away from home, e.g. second home, mobile home or on holiday
- If none of the above, How would you describe your visit today?

Further details

Q2 What is the main activity you are undertaking today? Tick closest answer. Do not prompt. Single response only.

- Dog walking
- Walking
- Jogging / power walking / running
- Outing with family
- Cycling / Mountain Biking
- Bird / Wildlife watching
- Enjoying scenery / fresh air
- Photography
- Meeting up with friends
- Picnic
- Horse riding
- Other, please detail:

Further details

Visitor surveys Lower Derwent and Skipwith  
Common

**Q3** Over the past year, roughly how often have you visited this site? Tick closest answer, single response only. Only prompt if interviewee struggles.

- Daily  
 Most days (180+ visits)  
 1 to 3 times a week (40-180 visits)  
 2 to 3 times per month (15-40 visits)  
 Once a month (6-15 visits)  
 Less than once a month (2-5 visits)  
 Don't know  
 First visit  
 Other, please detail

Further details:

**Q4** How long have you spent / will you spend at this site today? Single response only.

- Less than 30 minutes  
 Between 30 minutes and 1 hour  
 1-2 hours  
 2-3 hours  
 3-4 hours  
 4 hours +

Further details

**Q5** Do you tend to visit this area at a certain time of day? Tick closest answers. Multiple answers ok.

- Early morning (before 7 am)  
 Late morning (between 7 am and 10 am)  
 Midday (between 10 am and 2 pm)  
 Early afternoon (between 2 pm and 4 pm)  
 Late afternoon (between 4 and 6 pm)  
 Evening (after 6 pm)  
 Varies / Don't know  
 First visit

**Q6** Do you tend to visit this area more at a particular time of year for [insert given activity]? Multiple answers ok.

- Spring (Mar-May)  
 Summer (Jun-Aug)  
 Autumn (Sept-Nov)  
 Winter (Dec-Feb)  
 Equally all year  
 Don't know  
 First visit

**Q7** How long have you been visiting this site? Single response only. Do not prompt.

- Don't know  
 First visit  
 less than or approximately 6 months  
 less than or approximately 1 year  
 less than or approximately 3 years  
 less than or approximately 5 years  
 less than or approximately 10 years  
 more than 10 years

Further details:



Visitor surveys Lower Derwent and Skipwith  
Common

**Q8 How did you get here today? if necessary prompt with: What form of transport did you use? Single response only.**

- Car / van  
 On foot  
 Bus  
 Bicycle  
 Other, please detail

Further details:

**Now I'd like to ask you about your route today. looking at the area shown on this map, can you show me where you started your visit today, the finish point and your route please. Probe to ensure route is accurately documented. Use P to indicate where the visitor parked, E to indicate the start point and X to indicate the exit. Mark the route with a line; a solid line for the actual route and a dotted line for the expected or remaining route.**

**Q9 Is / was your route today the normal length when you visit here for [insert given activity]? Tick closest answer, do not prompt. Single response only.**

- Yes, normal  
 Much longer than normal  
 Much shorter than normal  
 Not sure / no typical visit  
 First visit

**Q10 Were you following a marked route or signposted route? Tick closest answer, do not prompt. Single response only.**

- No  
 Not sure/don't know  
 Yes

**Q11 If yes, what was the name or colour of the route you were following?**

**Q12 What, if anything, influenced your choice of route here today? Tick closest answers, do not prompt. Multiple responses ok.**

- Weather  
 Daylight  
 Time  
 Other users (avoiding crowds etc)  
 Group members (eg kids, less able)  
 Muddy tracks / paths  
 Followed a marked trail  
 Previous knowledge of area / experience  
 Activity undertaken (eg presence of dog)  
 Interpretation / leaflets / promotion  
 Viewpoint / Feature  
 Other, please detail

Further details:

Visitor surveys Lower Derwent and Skipwith Common

**Q13 Why did you choose to visit this specific location today, rather than another local site? Tick all responses given by visitor in the 'other' column. Do not prompt, tick closest answers. Then ask Which single reason would you say had the most influence over your choice of site to visit today? Tick only one main reason. Use text box for answers that cannot be categorised and for further information.**

	Other	Main
Don't know / others in party chose	<input type="radio"/>	<input type="radio"/>
Close to home	<input type="radio"/>	<input type="radio"/>
No need to use car	<input type="radio"/>	<input type="radio"/>
Quick & easy travel route	<input type="radio"/>	<input type="radio"/>
Good / easy parking	<input type="radio"/>	<input type="radio"/>
Particular facilities	<input type="radio"/>	<input type="radio"/>
Refreshments / cafe / pub	<input type="radio"/>	<input type="radio"/>
Choice of routes	<input type="radio"/>	<input type="radio"/>
Feels safe here	<input type="radio"/>	<input type="radio"/>
Quiet, with no traffic noise	<input type="radio"/>	<input type="radio"/>
Not many people	<input type="radio"/>	<input type="radio"/>
Scenery / variety of views	<input type="radio"/>	<input type="radio"/>
Rural feel / wild landscape	<input type="radio"/>	<input type="radio"/>
Particular wildlife interest (including trees)	<input type="radio"/>	<input type="radio"/>
Habit/familiarity	<input type="radio"/>	<input type="radio"/>
Good for dog / dog enjoys it	<input type="radio"/>	<input type="radio"/>
Ability to let dog off lead	<input type="radio"/>	<input type="radio"/>
Closest place to take dog	<input type="radio"/>	<input type="radio"/>
Closest place to let dog safely off lead	<input type="radio"/>	<input type="radio"/>
Appropriate place for activity	<input type="radio"/>	<input type="radio"/>
Suitability of area in given weather conditions	<input type="radio"/>	<input type="radio"/>
Presence of water	<input type="radio"/>	<input type="radio"/>
Other, please detail	<input type="radio"/>	<input type="radio"/>
Further details:	<input type="text"/>	

Visitor surveys Lower Derwent and Skipwith  
Common

I would now like to ask about other local sites that you visit for [given activity].

Q14 What proportion of your weekly visits for [given activity] take place at here compared to other sites. Can you give a rough percentage? *Do not prompt*

- All take place here
- 75% or more
- 50-74%
- 25-49%
- less than 25%
- Not sure/don't know/first visit

Q15 Which one location would you have visited today if you could not visit here? *Do not prompt, tick closest answer.*

- Not sure/ Don't know
- Nowhere/ wouldn't have visited anywhere
- Site Named:

Record site name:

Q16 Are there any changes you would like to see here with regards to how this area is managed for recreation and people? *Do not give options*

Visitor surveys Lower Derwent and Skipwith  
Common

**Q17** Do you have any further comments or general feedback about your visit and access to this area?

**Q18** What is your full home postcode? *This is an important piece of information, please make every effort to record correctly.*

**Q19** *If visitor is unable or refuses to give postcode:* What is the name of the town or village where you live?

**Q20** *If visitor is on holiday ask:* Which town / village are you staying in?

That is the end. Thank you very much indeed for your time.

Visitor surveys Lower Derwent and Skipwith  
Common

## Q21 TO BE COMPLETED AFTER INTERVIEW FINISHED.

Surveyor initials	<input type="text"/>
Survey location code	<input type="text"/>
Map Reference Number	<input type="text"/>
Gender of respondent	<input type="text"/>
Total number in interviewed group	<input type="text"/>
Total males	<input type="text"/>
Total females	<input type="text"/>
Total minors (under 18)	<input type="text"/>
Total number of dogs	<input type="text"/>
Number of dogs seen off lead	<input type="text"/>

Q22 **Surveyor comments.** *Note anything that may be relevant to the survey, including any changes to the survey entry that are necessary, eg typos/mistakes/changes to answers/additional information.*

## Appendix 2: Responses to Q16, are there any changes you would like to see here with regards to how this area is managed for recreation and people?

All responses are listed below. These were typed as part of the interview and often it was necessary to paraphrase, as such the comments do not necessarily reflect the precise words stated by the interviewee. Dark blue shading reflects comments recorded at Bank Island, paler blue from Wheldrake Ings and pale green from Skipwith.

Don't know

Don't make it commercial. Don't have cafe.

Leave the grass longer in the valley keeps the water longer.

Natural England more proactive in promoting the site. Cafe would be great. No visitor centre

Needs a circular route. Needs a cafe

Toilets not open

Allow dogs onto the path

Better access to the river banks, used to be much more accessible for fishing, now only one access next to the bridge.

Clearing around the riverside for people to see the views on the river. Nice to have a circular path.

Could get cars further, closer to the hides, to make it more accessible. Good number of hides.

Don't know enough about it

Happy with changes made to make it less muddy.

I like it quiet

Keep vehicles off the path, or to a minimum. They damage the path and make it dangerous for pedestrians to walk on.

Likes it quiet as it is.

Litter bin, periodically takes litter bags with him. Bench.

No, first visit

No, it is nice that it is so quiet

Tidier car park, allow more cars, more hides

Toilets would be nice

Very satisfying site

Would be nice to be able to walk dogs along the river path

A bit more local history (also for kids), more poo bins to keep the place clean

Education for people with dogs

Good

Like it as it is

Like seeing the livestock around

More for the children (adventure park with logs and ropes), more benches, food truck in the summer

More history boards (also for kids)

More wheelchair and pushchair access, the lane going through the common is full of holes

Nice bird hides

Nice, good management

No

No

Several times had to help sheep stuck in brambles, fences, mud, etc., dog owners not very respectful and a danger to the sheep, have seen a lot of dead sheep over the years...

Some people don't clean up after their dogs, or leave the poo bags on the path

Toilets, especially coming with family

Too many trees have been taken down over the years



## Appendix 3: Responses to Q17, further comments or feedback?

All responses are listed below. These were typed as part of the interview and often it was necessary to paraphrase, as such the comments do not necessarily reflect the precise words stated by the interviewee. Dark blue shading reflects comments recorded at Bank Island, paler blue from Wheldrake Ings and pale green from Skipwith.

Don't keep the water and the pools for a long enough time  
Feel really lucky to have these facilities. Could do with a more obvious sign on road to advertise it.  
Organise school trips to come here.

Important site has native corncrake here so should be managed better, have higher profile  
Lived in the area for 15 year and didn't know it was here. Sign on road hard to see. Honesty box to raise funds

Access from the east of the site

All fine.

Better disabled access would be good

Easy access.

Happy as it is

Improvements to approach road (closed by water flooding in winter)

No, easy access

No, first visit

Parking at Bank Island is very easy

Pretty good

Pretty good, well looked after

Signposting is very poor to come to this car park

Stones on the path make it hard to walk on

Toilets at car park would be good, signposting is not brilliant, nearly drove past...

A footpath from North Duffield would be nice

Clear routes, car parking at both ends is good

Dangerous to come out of car park as poor visibility to the left

good car park, easy to miss the entrance and look on the other side of the road towards other car park, sign is overgrown by vegetation

Good car parks, nice as it is

Good parking

Good, car parks are convenient, signage is good in regards to livestock, seems well managed, dog walkers seem respectful.

Great access

No, brilliant access at every entrance

No, too many people coming now, not always respectful of the place!...

Plenty of car parks, several accesses (although road a bit bumpy on the side of industrial area - see map)

Signage is not very good for the car park

Signage is really poor to find this car park, no sign coming from one direction, and sign hidden by vegetation coming from the other direction...

Very good access at different places



## **D. Strensall Common Visitor Survey**

### **Appendices**

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1



## Visitor surveys and impacts of recreation at Strensall Common SAC.

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## Summary

This report, commissioned by City of York Council, presents the results of visitor surveys at Strensall Common Special Area of Conservation (SAC). The survey results show the level of recreation use and current access patterns at the site and how this use relates to local housing. We review how access may impact on the nature conservation interest of the site and consider the potential implications of future housing development in and around Strensall village. The work relates to the York Local Plan and the implications of the housing development set out within the Plan on the designated nature conservation interest of the site.

Survey work involved counts of both people and vehicles and interviews with a random sample of visitors. Habitat mapping and target notes allowed us to consider the extent of current impacts of recreation.

Key findings from the visitor surveys are:

- The total number of parked vehicles around the site at any one time ranged from 4-16 with a mean of 9.7 vehicles. The Galtres car-park was the busiest car park.
- On a typical day in July-September we might expect around 108 vehicles, bringing 173 people a day.
- Counts of people entering the SAC were made at key access points (near the Sewage Works and at the two main car-parks at Scott Moncrieff and Galtres) and in addition automated counters (trail cameras) were used to count the number of people entering at two other, quieter entry points. These totals combined indicate around 17.2 'groups' entering the site on average per hour, or around 206 groups per 12-hour day.
- The counts and cameras indicated use by dog walkers, walkers, joggers, mountain bikes, horse riders.
- 199 interviews were conducted over 64 hours of fieldwork.
- Virtually all (95%) of interviews were with those who had undertaken a day trip/short visit directly from home that day, but the 3% of interviews included people staying away from home with friends/family and some (2%) were on holiday or staying in a second home/mobile home.
- 126 interviewees (63%) had at least one dog with them
- The total number of people in all the interviewed groups was 308 accompanied by 190 dogs; giving a mean of 1.5 people and 1 dog per group.
- The most frequently recorded activity across all survey points was dog walking (70% of interviewees). Other activities included walking (14%), outing with family (6%), jogging (5%), cycling (2%) and meeting with friends (2%).
- Around a third (32%) of all interviewees were visiting daily. Dog walkers were the group who visited the most frequently, with 43% visiting daily and a further 21% visiting most days.
- The majority of visits were short, with most (73%) spending less than an hour on the site.
- Nearly half (43%) of interviewees didn't tend to visit at a particular time of day.

V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
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- Most interviewees (78%) indicated that they visited Strensall Common equally all year round, and there was little evidence to suggest particular seasons were favoured by any particular activity group.
- Half (51%) of those interviewed had been visiting Strensall Common for at least 10 years and indicates that the Common is long established as a destination for recreation.
- Overall, two-thirds (67%) of interviewees had travelled by car, with a further 32% arriving on foot and one interviewee (1%) arriving by bicycle.
- The rural feel/wild landscape was the most common given reason underpinning site choice (52% of interviewees). Close to home was also important (51% of interviewees) and was the most commonly given single main reason for choosing Strensall Common as a destination.
- A quarter (25%) of interviewees stated that all their visits (for the activity they were undertaking when interviewed) took place at Strensall Common and for a further third (32%) of interviewees 75% or more of their visits were at Strensall Common.
- Interviewee home postcodes reflect a local catchment for the site, particularly Strensall and nearby settlements (Haxby, Wigginton, Park Estate). There was also a wedge of interviewee postcodes from south of the York bypass towards the city centre, around Earswick and Huntington – these included some regular visitors and a reasonable proportion of dog walkers.
- For those visiting directly from home on a short visit, the median distance ('as the crow flies') between the home postcode and survey point was 2.4km and 75% of visitors came from a radius of 5.5km.
- Dog walkers (median 3km), runners (median 1.7km) and those walking (median 1.45km) were all relatively local and for all these groups the 75<sup>th</sup> percentile was between 5 and 6km.
- A range of factors influenced the interviewees' choice of routes during their visit at Strensall Common. Time available was the most commonly given response (21%). Weather, previous knowledge/experience and activity undertaken were also common reasons (in all cases 10%). 'Other' reasons were varied but sheep were clearly a factor for many (cited by 12 interviewees).
- Routes were mapped as part of the interview. The mean route length as mapped was 3.7km ( $\pm$  1SE of 0.1), with a median of 3.5km. Routes ranged from 326m to 13.1km. When the route data were clipped to the SAC boundary, the mean was 2.7km ( $\pm$  1SE of 0.1), with a median of 2.5km. Routes ranged from 83m to 9.2km.

#### Potential housing change and estimates of changes in recreation use

- The allocations within the submission version of the York Local Plan include 6653 dwellings within 7.5km of Strensall Common. This represents approximately a 14% increase in the amount of housing. Some allocations are particularly close to the SAC and we predict a potential increase in housing of 61% within 500m of the SAC. Visit rates from current housing within 500m of the Common are particularly high, indicating that people who live close to the Common visit much more frequently.
- Based on the postcodes of interviewed visitors and the distribution of the housing allocations we predict a 24% increase in access at Strensall Common.

Impacts of recreation at Strensall Common include or potentially include:



V i s i t o r s u r v e y s a n d i m p a c t s o f r e c r e a t i o n a t  
S t r e n s a l l C o m m o n

- Trampling;
- Increased fire incidence;
- Disturbance to grazing livestock;
- Nutrient enrichment from dog fouling;
- Contamination of ponds;
- Contamination from fly tipping, litter etc.; and
- Damage to infrastructure (gates etc.).

A habitat survey undertaken in September 2018 indicates that recreational impacts are currently evident at Strensall Common, although these are mostly limited in extent and severity and are generally in found in fairly close proximity to the car parks. The most concerning impact is worrying of livestock by dogs, which is already resulting in loss of animals and may jeopardise future grazing. Appropriate grazing will be a vital tool in restoring the SAC to favourable condition.

Given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity. Mitigation measures are discussed.

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Survey work (interviews) was conducted by the following Footprint Ecology field surveyors: Graham Blight, Caroline Hallam, Phil Rotheram and Ben Wray. Fieldwork logistics were overseen by Fenella Lewin (Footprint Ecology) and the route data were digitised by Damiano Weitowitz (Footprint Ecology).

# 1. Introduction

## Overview

- 1.1 This report has been commissioned by City of York Council to further understand recreational use of Strensall Common, the potential impacts of recreation on the nature conservation interest of the site and any avoidance and mitigation measures necessary to resolve future impacts. The work relates to the submission version of the Local Plan and the implications of the housing development set out within the Plan on the designated nature conservation interest of the site.

## Strensall Common

- 1.2 Strensall Common supports one of the largest areas of lowland heath in northern England. Managed in mostly by the Ministry of Defence (MOD) and in part by the Yorkshire Wildlife Trust, extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands and ponds. The site is noted for its population of Marsh Gentians and Narrow Buckler-fern and for a range of invertebrates including the Dark Bordered Beauty Moth, for which the common is the only site in England with recent records<sup>1</sup>. The common supports a diverse bird population with breeding Curlew and Woodlark.
- 1.3 The common is designated as a Site of Special Scientific Interest (SSSI) and also forms part of the Natura 2000 network of European sites, designated as a Special Area of Conservation (SAC) for the heathland habitats (wet and dry heath) present on the site. The SAC boundary (which matches the SSSI boundary) and the location of the site are shown in Map 1.

## Legislative context

- 1.4 The designation, protection and restoration of European wildlife sites is embedded in The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018, which are commonly referred to as the 'Habitats Regulations.' These Regulations are in

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<sup>1</sup> There is evidence for a marked decline in the moth in recent years, linked to fire, weather and grazing (see Baker *et al.* 2016)

place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive.

- 1.5 As such, European sites have the benefit of the highest level of legislative protection for biodiversity. Public bodies, including local planning authorities, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For local planning authorities, this means that the combined effect of individual development proposals needs to be assessed collectively for their cumulative impact.
- 1.6 The legislation requires public bodies to be proactive, not reactive. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. This requires public bodies to put measures in place to prevent deterioration of European sites, not to wait until there is harm occurring that needs to be rectified. Where European sites are not achieving their potential, the focus of attention by public bodies should be on restoration.
- 1.7 Public bodies are referred to as 'competent authorities' within the legislation. The duties set out within the Habitats Regulations in relation to the consideration of plans and projects are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. The assessment process for plans or projects is called a Habitats Regulations Assessment ('HRA').

### **City of York Local Plan and need for this work**

- 1.8 It is the HRA work for the City of York Local Plan and consultation advice from Natural England that has identified the issue of increased recreational

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use on Strensall Common, and consequently the need for survey work and avoidance and mitigation measures to be taken forward.

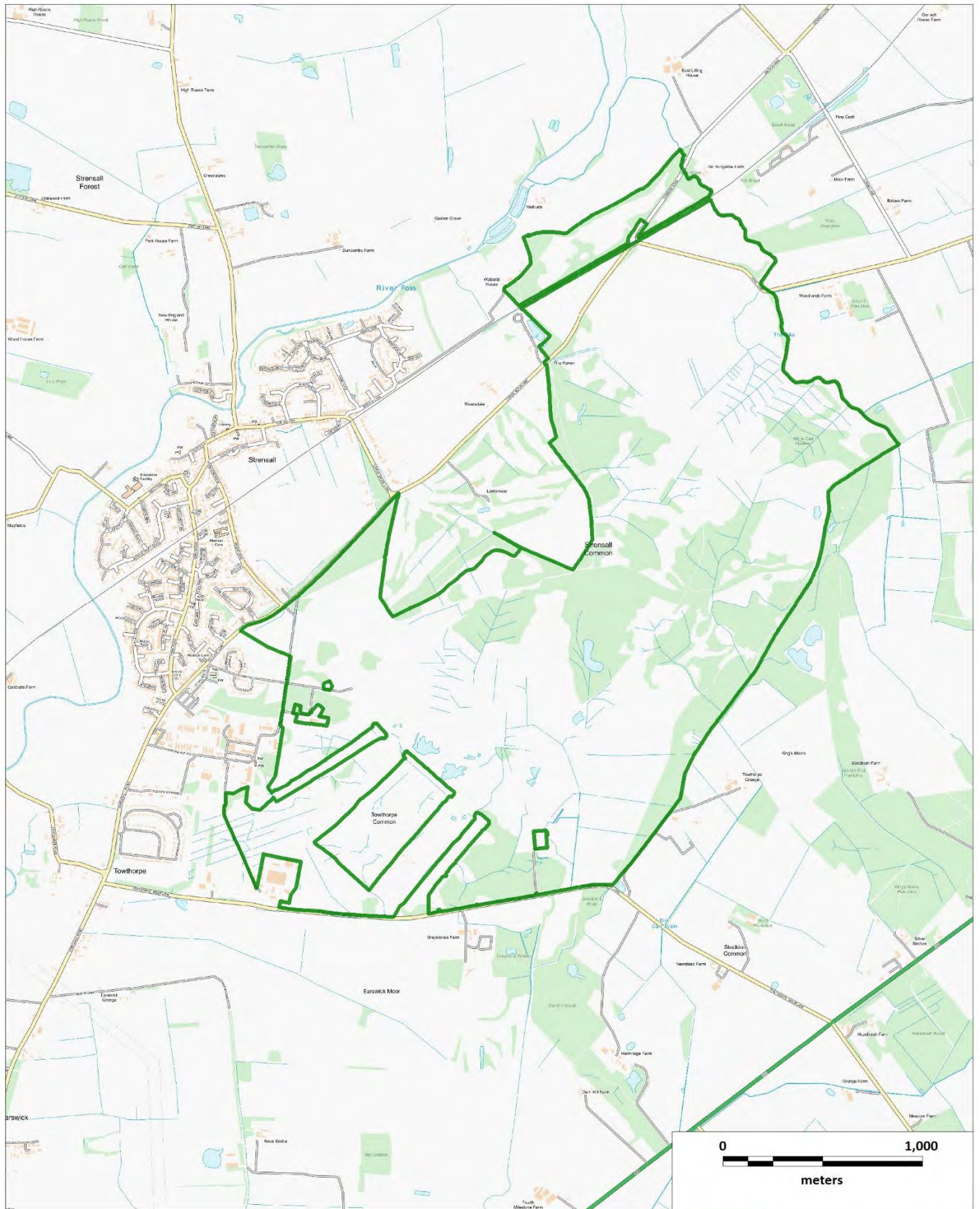
- 1.9 The City of York Local Plan was submitted to the Planning Inspectorate in May 2018. The Plan covers the period from 2017 to 2032/33 and sets out provision to accommodate an annual provision of around 650 new jobs and a minimum annual provision of 867 new dwellings over the plan period.
- 1.10 The HRA that accompanies the submission version of the Plan identified likely significant effects from recreation at Strensall Common SAC, in relation to three policies in the Plan: SS19/ST35, H59 and E18. All three allocations lie immediately adjacent to the SAC (see Map 2); SS19/ST35 provides for 500 new dwellings, H59 for 45 new dwellings and E18 allows for a 4ha employment area. The HRA identified risks relating to an increase in recreational pressure and impacts from trampling, erosion and eutrophication of the fragile heathland communities and potential interference with the management of the site by the disturbance of grazing livestock.
- 1.11 Following more detailed assessment, the HRA advised that adverse effects on integrity could be ruled out through the implementation of wardening on the Common to present a physical presence on site and encourage good behaviours by the public. Following the HRA work, Natural England wrote to the Council<sup>2</sup> to advise that no evidence has been provided to back up the conclusion of no adverse effects on integrity and that Natural England would expect to see a robust and comprehensive visitor assessment.
- 1.12 Following the advice from Natural England, the City of York commissioned this work, which aims to:
- Provide evidence on current levels of use and patterns of access at Strensall Common;
  - Understand the visitor origins and likely scale of change in access from new development;
  - Review the vulnerability of the site to recreation impacts; and
  - As relevant recommend mitigation approaches that will resolve any issues identified.

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<sup>2</sup> Letter dated 4<sup>th</sup> June 2018



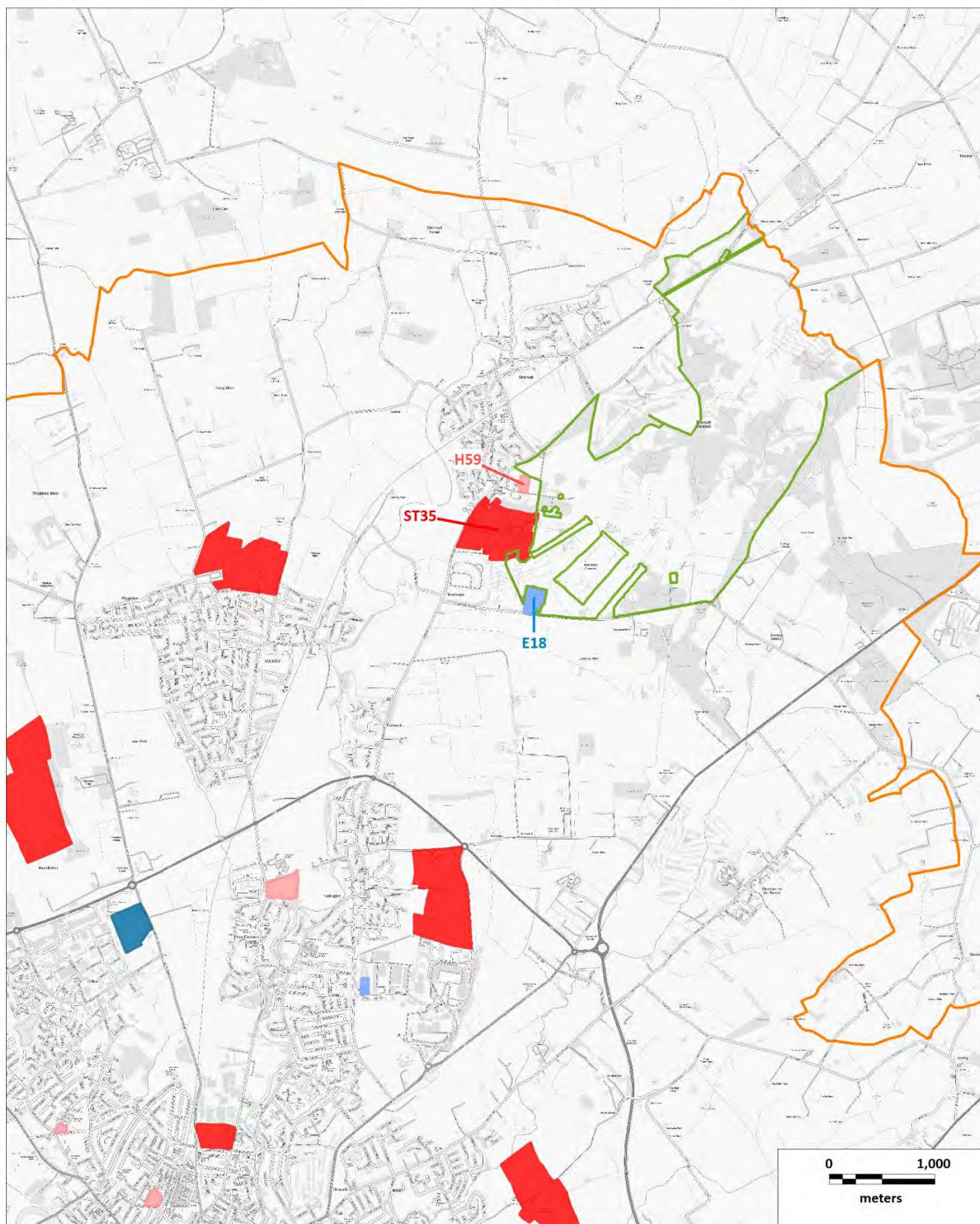
Map 1: Strensall Common SAC



Contains Ordnance Survey Data. © Crown Copyright and Database Right 2017. Designated site boundaries downloaded from the Natural England website. © Natural England.



Map 2: SAC and Local Plan allocations (labelled sites those identified in HRA)



Contains Ordnance Survey Data. © Crown Copyright and Database Right 2017.  
Designated site boundaries downloaded from the Natural England website. © Natural England.  
Local plan allocation site boundaries provided by City of York Council.

## 2. Methods

### Overview

- 2.1 Visitor fieldwork included the following:
- Face-face interviews and direct counts
  - Car-park counts
  - Automated counters
- 2.2 In order to review the current impacts of recreation on the SAC interest and the ecology of the site, the following were undertaken:
- Site visit, target notes and habitat mapping
- 2.3 Details of these different work areas are set out below.

### Face-face interviews and direct counts

- 2.4 These were conducted by a surveyor positioned at an entry point and counted people passing and interviewed a selection of visitors.
- 2.5 The counts were in the form of a tally, recording numbers of groups, people, horses, cycles and dogs (entering, leaving or passing).
- 2.6 Face-face interviews were conducted with a random selection of visitors (the random selection was achieved by selecting the next person seen after completing the previous interview). Only one person per group was interviewed, and no unaccompanied minors were approached.
- 2.7 Surveys were conducted on tablets hosting SNAP survey software and the questionnaire (Appendix 1) was conducted verbally, with the surveyor recording the responses of the interviewee onto the tablet. At the end of the interview the group size, gender of interviewee, number of dogs in group and whether dogs were seen off lead were recorded.
- 2.8 Routes taken by respondents (or planned to be taken if they were just setting off) were recorded by drawing the visitor's route on a paper map linked by a unique reference number to the SNAP questionnaire. These routes were later digitised to give a polyline in GIS.
- 2.9 The interviews and counts took place at three locations (Map 3 and Table 1).

V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
S t r e n s a l l   C o m m o n

**Table 1: Strensall Common interview/count locations.**

	Location	Description/ notes	Grid reference
1	Scott Moncrieff Road car-park	Main car-park.	SE6358 5982
2	Galtres car-park	Main car-park	SE6485 6120
3	on Foss Walk, YWT section	By sewage works, at track junction and close to railway crossing. Likely to be low levels of use.	SE6469 6161

2.10 Surveys took place at location 1 and 2 during late August (8 hours at each location) and then during early September all three locations were surveyed for a total of 16 hours. This gives a total of 16 hours survey work in August and 48 hours in September.

2.11 Survey times covered: 0700-0900; 1000-1200; 1300-1500; 1700-1900 (by splitting the day into 2 hour blocks the surveyor is able to take comfort breaks yet data are collected from across daylight hours). The August surveys took place on a Thursday and a Friday (no live firing) with the surveys split between the two car-parks on each day (i.e. 4 hours total in each car-park on each day).

2.12 In September the same survey timing was used (8 hours per day, split into two-hour sessions), and each location was surveyed such that each time period was covered on a weekday and weekend day at each location.

2.13 Effort was made to avoid adverse weather conditions. The surveys took place during a period of unsettled and changeable weather at the end a prolonged dry and very hot summer. The 16 hours of surveys in August at the two main car-parks were both entirely rain free and the 16 hours of survey at the Foss Walk survey point were also rain-free. At the Galtres and Scott Moncrieff survey points in September there was some rain (at both sites three out of eight two-hour sessions had some rain).

### Car-park counts

2.14 Eight transects counting parked cars were undertaken (Table 2). These involved the recorder driving round the site and logging all parked vehicles at the various parking locations (shown in Map 3) including the two main car-parks and all lay-bys and other informal parking areas. It took around 30 minutes to visit all locations and the counts were a 'snapshot' in time, reflecting the number of vehicles present when the recorder entered the parking location. Direction of travel was varied between different transects.



**Table 2: Dates and start times of transects counting all parked vehicles around the SAC.**

Date	Start Time	Day
12/07/2018	16:04	Thursday
30/07/2018	11:17	Monday
14/08/2018	10:40	Tuesday
14/08/2018	13:19	Tuesday
15/09/2018	08:20	Saturday
19/09/2018	18:44	Saturday
22/09/2018	12:45	Saturday
22/09/2018	16:32	Saturday

## Automated counters

- 2.15 Two automated counters were used to derive an estimate of visitor use at parts of the site where it was considered potentially too quiet to place a surveyor. Trail cameras were used, placed low to the ground alongside paths enabling them to record feet, wheels etc. and the direction of travel, without recording any personal information (faces etc.). Locations are shown on Map 3. Both were away from the main car-parks and close to entry points with minimal parking.
- 2.16 Cameras were set to record one image per 'trigger' and reset after 20 seconds, meaning that the cameras would for example record separate images of two people that were walking 20 seconds apart.
- 2.17 Images were reviewed and any images that were not related to access were filtered out – in most cases these involved sheep or wildlife (such as foxes, badgers, squirrels etc). Images were then reviewed in time order and estimates made of the number of discrete events passing in each direction. It was not always straightforward to assign activity or identify which passes were discrete events. Dog walkers could usually be recognised by the presence of a dog or because a lead was visible. Bicycles and horses were clearly visible and joggers were recognisable by trainers and speed of movement. Images separated by more than a minute were assumed to be separate events unless clearly the same.

## Site visit, target notes and habitat mapping

- 2.18 A site visit to map vegetation types and features and record current evidence of recreational pressure was carried out between 13<sup>th</sup>- 15<sup>th</sup> September.

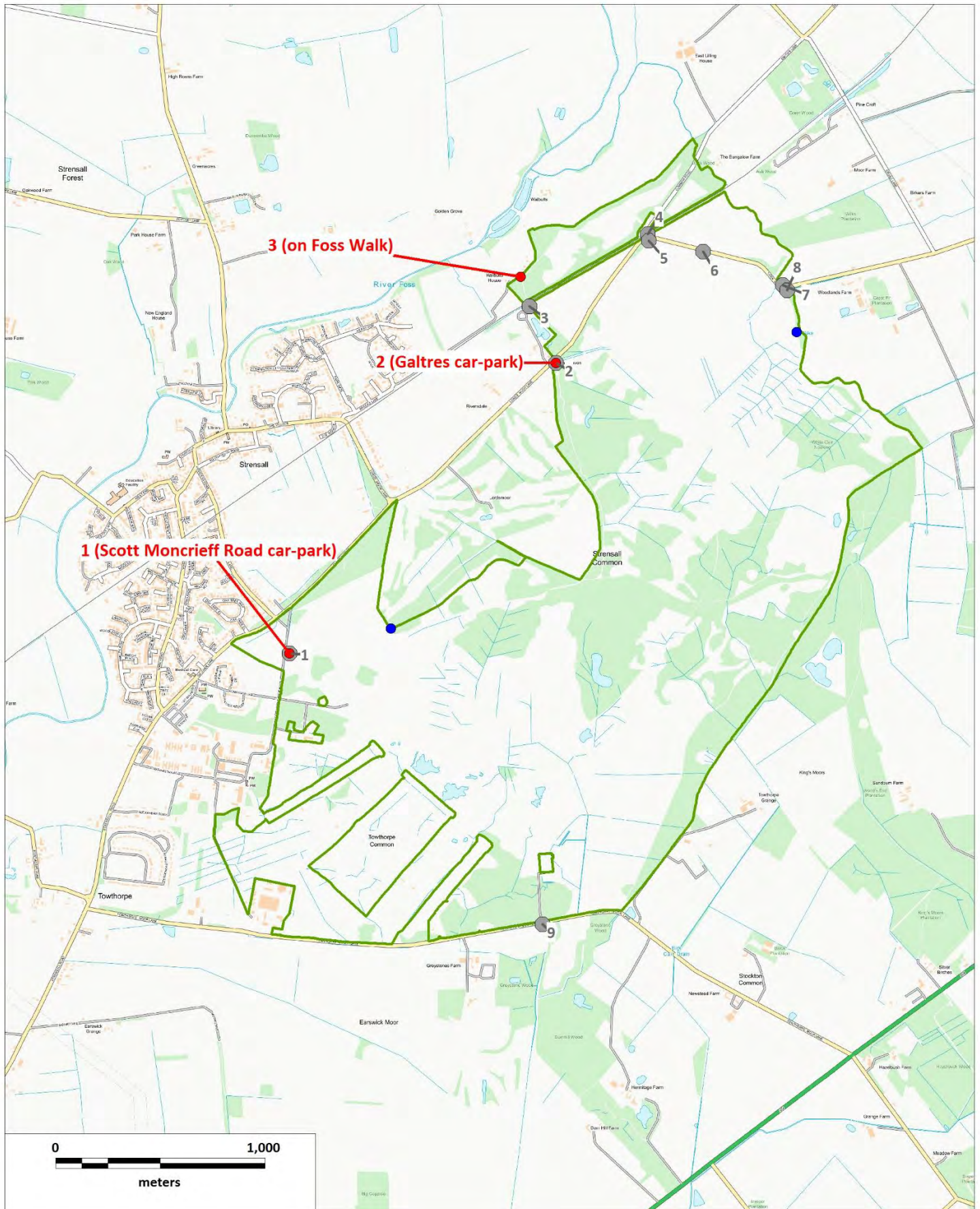
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Vulnerability of designated habitat types and features to increased recreational pressure was assessed at the same time. Habitat mapping was carried out using the recently launched UKHab<sup>3</sup> (which combines previous systems such as Phase one, National Vegetation Classification (NVC), Annex I etc.) and was also partly informed by a National Vegetation Survey of the site carried out in 2009 (Wilson 2009).

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<sup>3</sup> <https://www.ceh.ac.uk/news-and-media/news/unified-habitat-classification-system-launched>

Map 3: Strensall Common survey points



- Interviews/direct counts
- Automated counter
- Parking locations included in transect
- SAC boundary



### 3. Car-park count results

- 3.1 A total of eight car-park counts were conducted, each involving driving past all the parking locations around the common in sequence and counting the number of parked cars. The number of vehicles ranged from 4 to 16 (Figure 1). The median number of vehicles counted was 9 and the mean 9.7. There appeared to potentially be some differences between different days – the two highest counts were both Saturday afternoons for example. However, the lowest count was a Saturday late afternoon (starting 18:44).

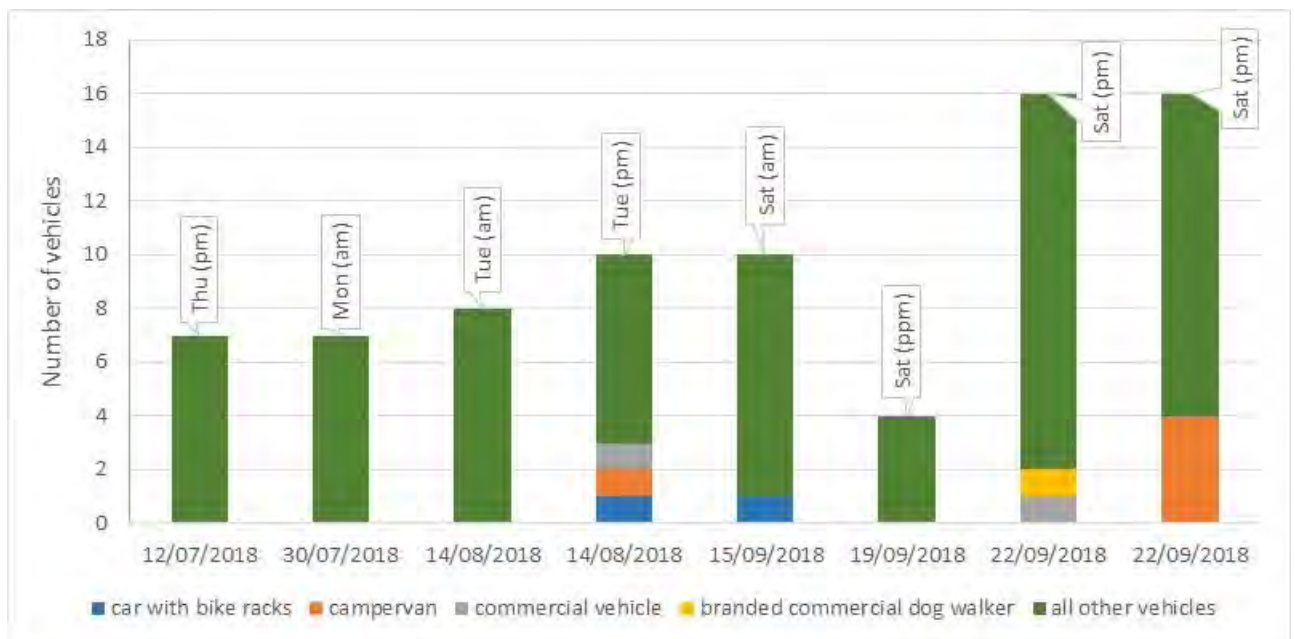


Figure 1: Car-park transect results by date and vehicle types

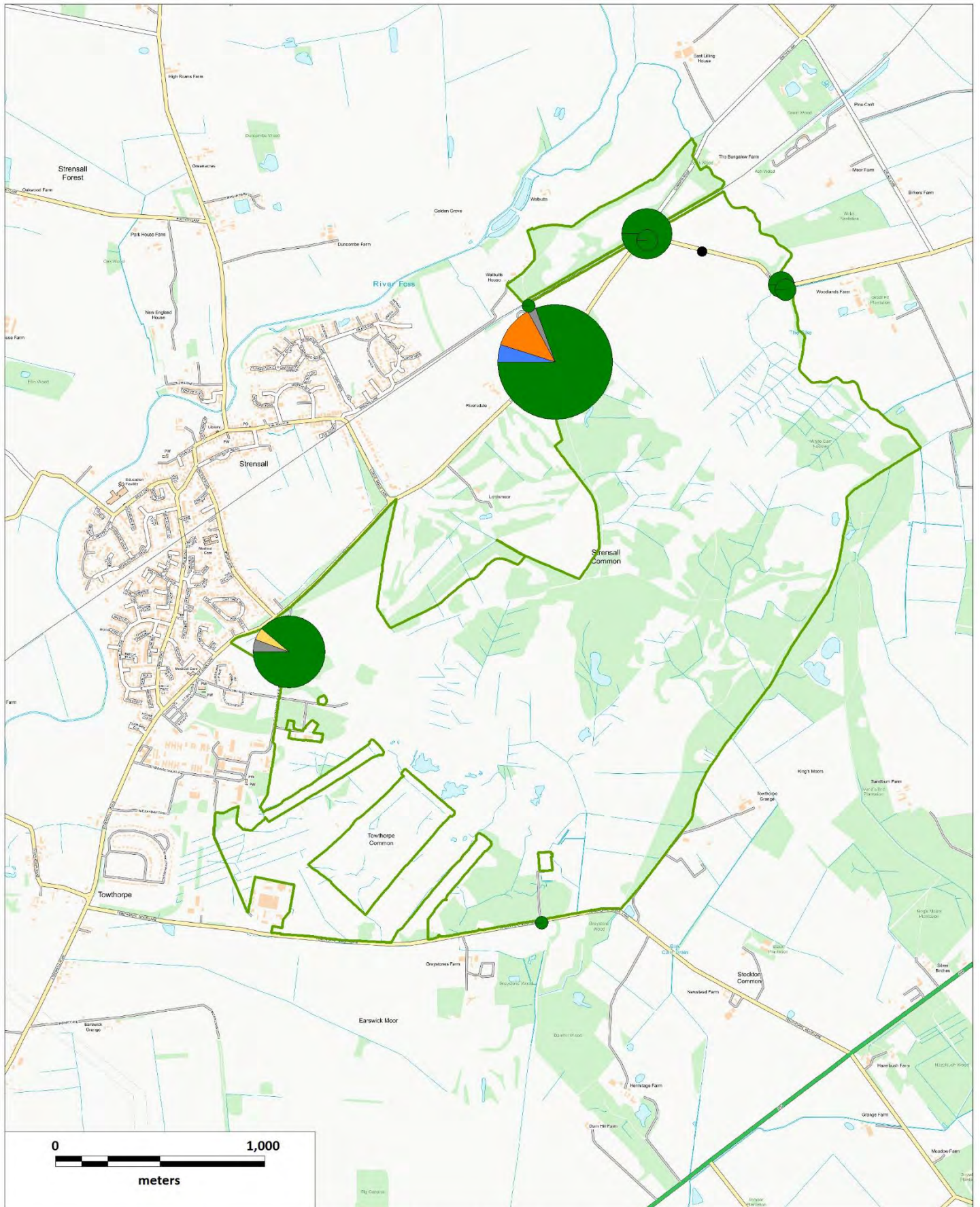
- 3.2 The results are shown spatially in Map 4. This shows that the majority of the parked vehicles were in the two main car-parks and that the Galtres car-park was the busiest. It was also the two main car-park where campervans, cars with bike racks, commercial vehicles and the branded dog walker vehicle were recorded.
- 3.3 If we assume a typical visit length to be around one hour (from the interview data, see Table 9) and typical car-occupancy to be 1.6 (again from the interview data, see para 6.12), then if 9 vehicles are typically present at any given time over a 12 hour day we would expect around 108 vehicles in total and these would bring around 173 people a day. These extrapolations are approximate and simple, reflecting the data collected during the survey period (i.e. July-September) rather than an extended period. We have not



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attempted to account for variation during the day or discounted cars that might not relate to people visiting Strensall Common for recreation. Nonetheless they provide an approximation of the footfall from those arriving by car.



Map 4: Counts of parked vehicles




 SAC boundary

**Total vehicles counted across 8 transects**



 Car with bike rack  
 Campervan

 Commercial vehicle  
 Branded commercial dog walker

 All other vehicles

## 4. Automated counter results

4.1 This section summarises the results from the two automated counters (trail cameras) placed low to the ground in different parts of the site. The data are extracted for each to give access events – these are where the camera has been triggered by people, vehicles, bicycles, dogs, horses etc. Where the camera was triggered multiple times in quick succession and clearly showed the same group (for example at the second location people regularly lingered in front of the gate or while opening the gate triggered the camera more than once) then only one event was logged. The cameras also were triggered multiple times where the group was spread out. This was also the case for dog walkers where the dog was off the lead and ahead of the owner such that both the dog and the owner separately triggered the camera. Generally, we carefully reviewed images that were within 1 minute of each other to check.

4.2 Some examples of images from the two cameras are provided in Figure 4.

### Counter 1: northern edge of site

4.3 This counter was set up on the afternoon of the 12<sup>th</sup> July and retrieved on the morning of the 30<sup>th</sup> July, giving a total of 17 full days of recording (13<sup>th</sup>-29<sup>th</sup>). In total 1007 images were logged, these were estimated from reviewing the images to involve 162 access events<sup>4</sup>. These are summarised in Figure 2 and are also compared to the tally counts on Map 5 (next section). The events were mostly during daylight but revealed use by dog walkers on a number of dates before 6am and joggers using the site after 9pm, indicating use spread over a considerable time window spanning more than 15 hours.

4.4 On virtually all dates there was a higher proportion of access moving south compared to north, indicating that a proportion of visitors were undertaking a circuit and not retracing their steps. The results are broken down by day and activity in Table 3. Activities were predominantly dog walking (49 events in total), walking (39 events) and jogging (36 events) but did also include small numbers of people taking photographs, horse riding and cycling. A quad bike was logged three times and was presumed to be the grazier and 9 events involved people in camouflaged clothing and these were categorised as MOD. The 25<sup>th</sup> July was particularly busy, the data showed a pulse of

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<sup>4</sup> The large volume of records that were not access events were mostly sheep.

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activity around late morning and particularly involved walkers. Many of these walkers were wearing military-style boots but were classified as walkers as they did not to be in full military clothes, nonetheless the peak on that day may relate to some training event. Including the data from the 25<sup>th</sup>, the average number of events per day moving south was 5.6 and the number of events moving north was 3.3.

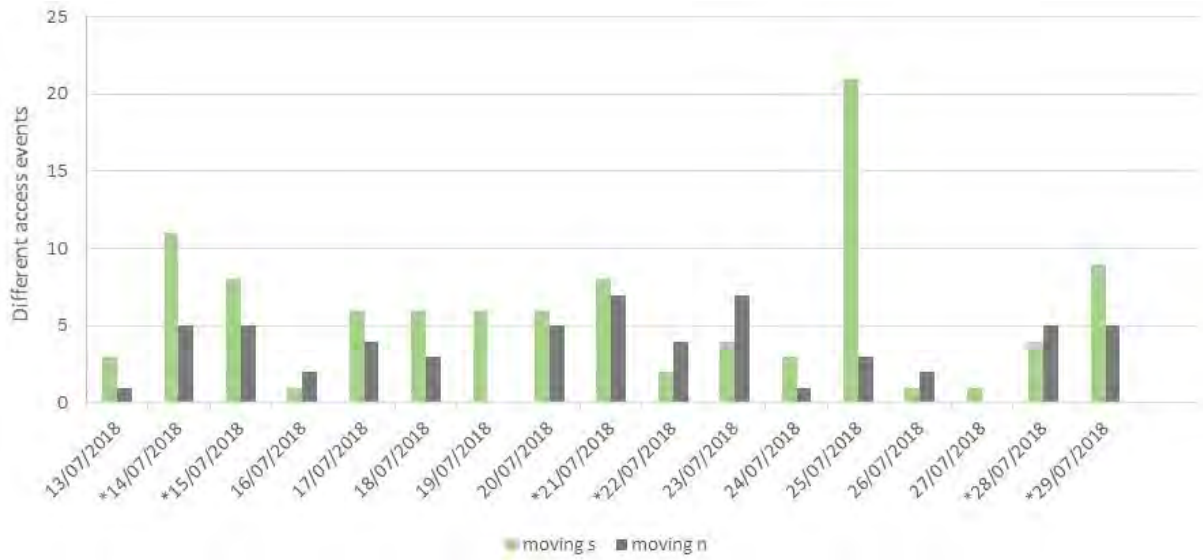


Figure 2: Day totals for counter 1 on the northern edge of the site. Asterisks by the date indicate weekends



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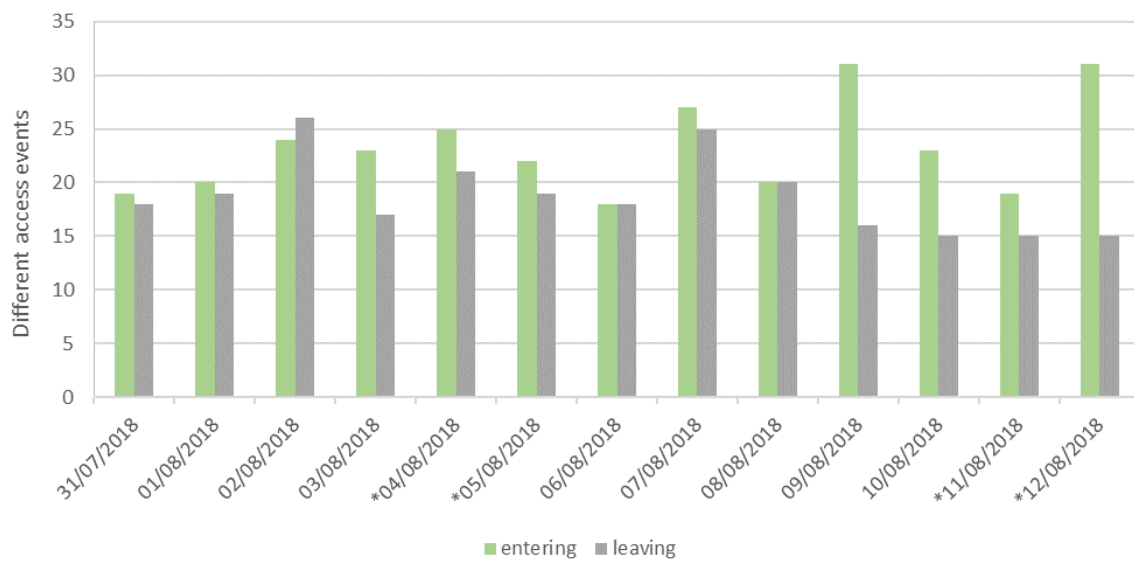
**Table 3: Summary of access events that triggered the camera (northern edge). Cell values reflect events moving north/moving south. Weekend days are shaded pale grey.**

Date	Cyclin g	Dog Walking	Horse riding	Joggin g	MO D	Photo- graphy	Quad bike	Walkin g	Total
13/07/2018	0/0	0/1	1/0	0/2	0/0	0/0	0/0	0/0	1/3
14/07/2018	0/0	2/5	0/0	2/3	0/0	0/0	0/0	1/3	5/11
15/07/2018	0/1	1/3	0/0	4/3	0/0	0/0	0/0	0/1	5/8
16/07/2018	1/0	0/1	0/0	1/0	0/0	0/0	0/0	0/0	2/1
17/07/2018	0/2	0/0	1/0	0/0	0/0	3/2	0/0	0/2	4/6
18/07/2018	1/0	1/3	0/0	0/2	0/0	0/0	0/1	1/1	3/7
19/07/2018	0/2	0/2	0/0	0/0	0/0	0/0	0/0	0/2	0/6
20/07/2018	0/0	0/2	0/0	0/1	4/3	0/0	0/0	1/0	5/6
21/07/2018	0/2	2/3	0/0	3/2	0/0	0/0	0/0	2/1	7/8
22/07/2018	0/1	0/1	1/0	2/0	0/0	0/0	0/1	1/0	4/3
23/07/2018	0/0	2/0	1/0	3/1	0/0	0/0	0/0	1/3	7/4
24/07/2018	1/1	0/2	0/0	0/0	0/0	0/0	0/0	0/0	1/3
25/07/2018	0/2	0/2	1/0	0/3	1/1	0/0	0/1	1/13	3/22
26/07/2018	0/0	0/1	0/0	0/0	0/0	0/0	0/0	2/0	2/1
27/07/2018	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/1
28/07/2018	0/0	4/3	0/0	1/0	0/0	0/0	0/0	0/1	5/4
29/07/2018	0/1	4/4	0/1	0/2	0/0	0/0	0/0	1/1	5/9
<b>Total</b>	<b>3/12</b>	<b>16/33</b>	<b>5/1</b>	<b>16/20</b>	<b>5/4</b>	<b>3/2</b>	<b>0/3</b>	<b>11/28</b>	<b>59/103</b>

## Counter 2: eastern edge of the site

4.5 This camera was set up on the 31<sup>st</sup> July and left in situ until 12<sup>th</sup> September. During this time, it recorded over 3000 images. Images were scrutinised for the initial two weeks only, until the 12<sup>th</sup> August, giving 13 complete days and spanning two weekends. During this time 547 discrete access events were recorded. Day totals are summarised in Figure 3; the average daily number of events was 23.2 events entering (heading south-east) and 18.2 events leaving (heading north-west towards the road). Totals for the counter are also shown on Map 5 (next section) where they are compared to the actual counts made through the tally counts.

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**Figure 3: Day totals for counter 2 on the eastern edge of the site. Asterisks by the date indicate weekends. The camera was positioned near a gate into the site – entering is therefore people entering the common and heading south-east and leaving going in the opposite direction, towards the road.**

**Table 4: Summary of access events that triggered the camera (eastern edge). Cell values reflect events entering/leaving. Weekend days are shaded pale grey.**

Date	Cycling	Dog walking	Jogging	MOD	Photography	Walking	Wildlife Watching	Workmen	Total
31/07/2018	2/1	15/8	7/5	0/0	1/1	6/3	0/0	0/0	31/18
01/08/2018	0/1	11/6	6/5	0/0	0/0	3/7	0/0	0/0	20/19
02/08/2018	2/4	10/7	2/6	0/6	0/0	3/3	0/0	2/0	19/26
03/08/2018	0/0	9/10	9/5	0/0	0/0	2/2	0/0	0/0	20/17
04/08/2018	3/1	11/10	2/6	0/0	0/0	8/4	0/0	0/0	24/21
05/08/2018	3/1	10/6	4/3	0/0	0/0	6/9	0/0	0/0	23/19
06/08/2018	1/0	10/7	7/8	0/0	0/0	7/3	0/0	0/0	25/18
07/08/2018	1/2	12/12	3/8	0/0	0/0	5/3	1/0	0/0	22/25
08/08/2018	3/2	12/9	2/6	0/0	0/0	1/3	0/0	0/0	18/20
09/08/2018	1/2	12/6	8/7	0/0	0/0	6/1	0/0	0/0	27/16
10/08/2018	0/0	11/7	4/4	1/1	0/0	4/3	0/0	0/0	20/15
11/08/2018	0/2	17/9	3/1	0/0	0/0	11/3	0/0	0/0	31/15
12/08/2018	0/1	13/10	6/3	0/0	0/0	4/1	0/0	0/0	23/15
<b>Total</b>	<b>16/17</b>	<b>153/107</b>	<b>63/67</b>	<b>1/7</b>	<b>1/1</b>	<b>66/45</b>	<b>1/0</b>	<b>2/0</b>	<b>303/244</b>

4.6 Additional data recorded by the camera included a cat on two occasions and also on two different dates multiple images of sheep were captured. These

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images suggested the gate may have been left open, but it was not possible to tell for certain.



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Figure 4: Examples of images from the automated counters. Left hand set are from the counter on the northern edge; right hand ones from the counter on the eastern edge of the site.

## 5. Direct counts of people: tally counts

- 5.1 Tally counts were maintained by the surveyors when on-site conducting interviews. These tallies reflected the number of people entering or leaving at the survey point.
- 5.2 Data are summarised in Table 5, which gives the total numbers of groups, people and dogs “entering” on each date. The days are directly comparable in terms of the amount of hours and times that the surveyor was recording however note that Galtres and Scott Moncrieff were surveyed for the extra time in late August.

**Table 5: Tally data, groups, people and dogs entering at each survey point. Weekend days are shaded pale grey.**

Date	Day	groups entering			total people			total dogs		
		Galtres	Scott Moncrieff	Foss Walk	Galtres	Scott Moncrieff	Foss Walk	Galtres	Scott Moncrieff	Foss Walk
30-Aug	Thurs	15	15		25	19		7	14	
31-Aug	Fri	19	19		21	28		15	9	
01-Sep	Sat			21			28			16
03-Sep	Mon			17			20			12
07-Sep	Fri		50			76			54	
08-Sep	Sat	59			87			63		
09-Sep	Sun		88			134			87	
10-Sep	Mon	37			50			45		
<b>Total</b>		<b>130</b>	<b>172</b>	<b>38</b>	<b>183</b>	<b>257</b>	<b>48</b>	<b>130</b>	<b>164</b>	<b>28</b>

- 5.3 The Tally data give a total of 340 groups entering, involving 488 people counted and a total of 322 dogs, equivalent to 1.4 people and 0.9 dogs per group.
- 5.4 In Map 5 we show the tally data converted to an hourly rate and presented alongside the automated counter data. The size of the red circles indicates the number of groups passing in one direction. While the data are different for the two survey methods, the conversion to an hourly rate does allow the two data sets to be presented alongside each other. For the tally data the hourly rate was the total number of groups entering, divided by the total number of survey hours (24 hours at the two main car-parks and 16 hours at the Foss Walk survey point). For the automated counters the data are the

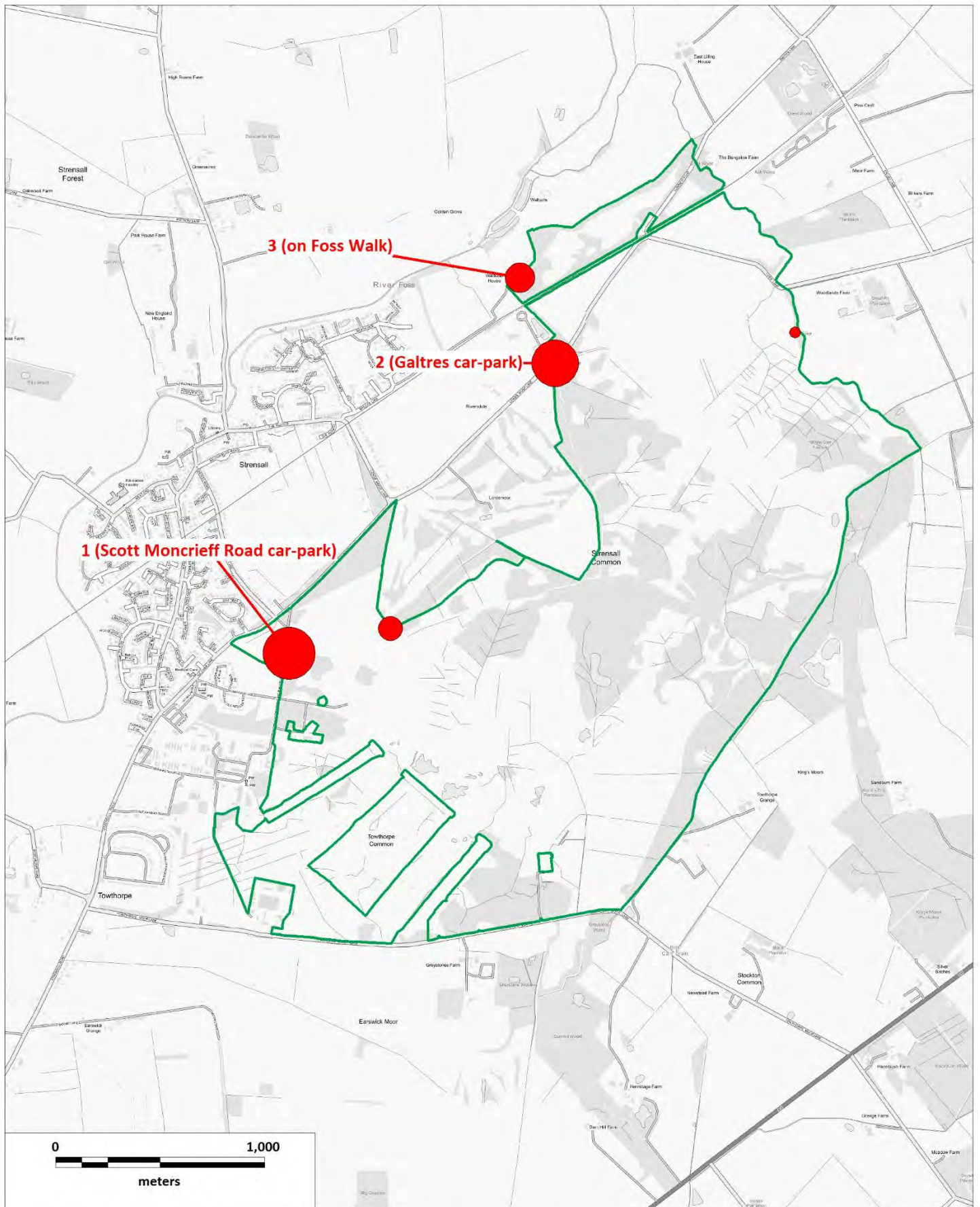
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access events 'entering' (i.e. moving south in both cases) between 0700 and 1900 hours only. The total hours for each counter was the number of days multiplied by 12. These results suggest that the three interview locations had the largest visitor flow with 7.2 groups per hour entering at the Scott Moncrieff car-park and 5.4 at the Galtres Road car-park. The northern automated counter locations recorded, by comparison 0.4 events per hour on average.

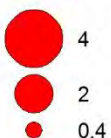
- 5.5 Combining these hourly rates across all the five locations shown in Map 5 indicates around 17.2 groups entering per hour, i.e. 206 groups over 12 hours.



Map 5: Tally count data and automated counter results: groups passing per hour



Tally data and automated counter data: access events entering per hour



## 6. Visitor interview results

### Overview

- 6.1 A total of 199 interviews were conducted, with the majority (92%) at the two main car-parks on Scott Moncrieff Road and Galtres (Table 6). Virtually all (95%) of interviews were with those who had undertaken a day trip/short visit directly from home that day; 3% of interviews were with people staying away from home with friends/family and some 2% were on holiday or staying in a second home/mobile home. This latter category were all interviewed at the survey point near the sewage works or at Galtres car-park, both of which are a short distance from the caravan/camp site.
- 6.2 In total 51% of interviews were conducted on the two-person days of fieldwork undertaken in August, with the remaining 45% undertaken on six person days in September.

**Table 6: Number (%) of interviews by visit type and date (from Q1).**

Visit type	Aug		Sept			Total
	Scott Moncrieff Road	Galtres car-park	Galtres car-park	On Foss Walk	Scott Moncrieff Road	
Day trip/short visit, travelling directly from home that day	70 (35)	29 (15)	46 (23)	14 (7)	31 (16)	<b>190 (95)</b>
Day trip/short visit, staying away from home with friends/family	0 (0)	1 (1)	1 (1)	3 (2)	0 (0)	<b>5 (3)</b>
Staying away from home, e.g. second home, mobile home or on holiday	0 (0)	2 (1)	2 (1)	0 (0)	0 (0)	<b>4 (2)</b>
<b>Total</b>	<b>70 (35)</b>	<b>32 (16)</b>	<b>49 (25)</b>	<b>17 (9)</b>	<b>31 (16)</b>	<b>199 (100)</b>

- 6.3 The average interview duration was 6.9 minutes, with interviews ranging in length from 2.6 minutes to 24.6 minutes. In 84 interviews (42%) the gender of the interviewee was female; 115 interviews (58%) were with men. Group size (i.e. the total number of people with the interviewee, including the interviewee), ranged from 1 to 8 (the latter a group of friends who meet up regularly to walk on the Common). Around two-thirds (64%) of interviewees were visiting on their own (i.e. group size of 1). A total of 146 interviewees

(73%) had at least one dog with them and the number of dogs with the interviewees ranged from 1-4. The total number of people in all the interviewed groups was 308 accompanied by 190 dogs; giving a mean of 1.5 people and 1 dog with each interviewee. Of the 190 dogs observed, 85 (45%) of them were off lead during the interview. It should be noted that the interviews were at entry points and particularly main car-parks so the numbers of dogs let off the lead during the walk could be much higher.

## Activities undertaken (Q2)

- 6.4 The most frequently recorded activity across all survey points was dog walking (70% of interviewees) (Figure 5), and this was the case at all survey locations (Table 7). Walking was the next most common activity (14% of interviewees). The Foss Way survey point held a higher proportion of walkers (35% of interviewees) compared to other locations. Other activities were relatively infrequent but included family outings, jogging/power walking/running, cycling/mountain biking, meeting up with friends, photography and bird wildlife watching. 'Other' activities (which did not fit with the standard categories on the questionnaire) accounted for 1% of interviewees and these included one interviewee having a picnic, another enjoying the scenery and one foraging for mushrooms.

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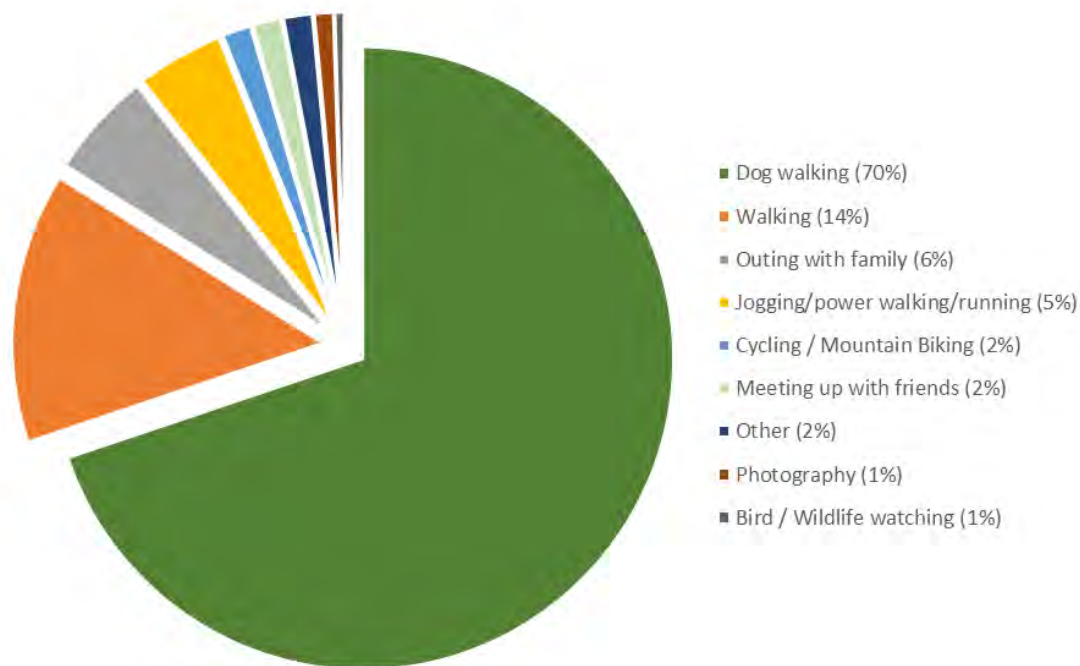


Figure 5: Activities undertaken (all 199 interviewees); from Q2.

Table 7: Number (column %) of interviewees by activity and survey point.

Activity	Galtres car-park	On Foss Walk	Scott Moncrieff Road car-park	Total
Dog walking	55 (68)	9 (53)	75 (74)	<b>139 (70)</b>
Walking	9 (11)	6 (35)	13 (13)	<b>28 (14)</b>
Outing with family	5 (6)	0 (0)	6 (6)	<b>11 (6)</b>
Jogging/power walking/running	3 (4)	1 (6)	5 (5)	<b>9 (5)</b>
Cycling/Mountain Biking	2 (2)	0 (0)	1 (1)	<b>3 (2)</b>
Meeting up with friends	2 (2)	0 (0)	1 (1)	<b>3 (2)</b>
Other	2 (2)	1 (6)	0 (0)	<b>3 (2)</b>
Photography	2 (2)	0 (0)	0 (0)	<b>2 (1)</b>
Bird/Wildlife watching	1 (1)	0 (0)	0 (0)	<b>1 (1)</b>
<b>Total</b>	<b>81 (100)</b>	<b>17 (100)</b>	<b>101 (100)</b>	<b>199 (100)</b>

6.5 Comparing the August data with the September data for the two relevant survey points (Galtres and the Scott Moncrieff car-park) there was a lower percentage of dog walkers in August (65% compared to 75%) and a higher percentage of walkers (19% compared to 8%). Comparing the proportions of



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interviewees undertaking the main activities (dog walking, walking and all other activities) there was however no significant difference between August and September ( $\chi^2_2=4.427$ ,  $p=0.109$ ).

## Temporal visiting patterns, frequency of visit, time of day etc. (Q3-7)

6.6 Around a third (32%) of all interviewees were visiting daily (Table 8). Dog walkers were the group who visited the most frequently, with 42% visiting daily and a further 21% visiting most days. Those walking, on an outing with the family or jogging/power walking/running tended to visit less frequently with 1-3 times a week the most common visit frequency for these activities.

**Table 8: Numbers (row %) of interviewees and frequency of visit (Q3) by activity. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value.**

Activity	Daily	Most days (180+ visits)	1 to 3 times a week (40-180 visits)	2 to 3 times per month (15-40 visits)	Once a month (6-15 visits)	Less than once a month (2-5 visits)	First visit	Other	Total
Dog walking	58 (42)	29 (21)	28 (20)	6 (4)	6 (4)	7 (5)	5 (4)	0 (0)	<b>139 (100)</b>
Walking	2 (7)	4 (14)	8 (29)	4 (14)	3 (11)	6 (21)	1 (4)	0 (0)	<b>28 (100)</b>
Outing with family	1 (9)	0 (0)	4 (36)	3 (27)	1 (9)	0 (0)	2 (18)	0 (0)	<b>11 (100)</b>
Jogging/power walking/running	1 (11)	2 (22)	5 (56)	1 (11)	0 (0)	0 (0)	0 (0)	0 (0)	<b>9 (100)</b>
Meeting with friends	1 (33)	0 (0)	1 (33)	0 (0)	0 (0)	1 (33)	0 (0)	0 (0)	<b>3 (100)</b>
Cycling/Mtn. Biking	1 (33)	1 (33)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (33)	<b>3 (100)</b>
Other	0 (0)	0 (0)	0 (0)	1 (33)	0 (0)	0 (0)	2 (67)	0 (0)	<b>3 (100)</b>
Photography	0 (0)	0 (0)	0 (0)	0 (0)	1 (50)	0 (0)	0 (0)	1 (50)	<b>2 (100)</b>
Bird/Wildlife watching	0 (0)	0 (0)	1 (100)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	<b>1 (100)</b>
<b>Total</b>	<b>64 (32)</b>	<b>36 (18)</b>	<b>47 (24)</b>	<b>15 (8)</b>	<b>11 (6)</b>	<b>14 (7)</b>	<b>10 (5)</b>	<b>2 (1)</b>	<b>199 (100)</b>

6.7 The majority of visits were short, with most (73%) spending less than an hour on the site (Table 9).

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**Table 9: Numbers (row %) of interviewees and visit duration (Q4). Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value.**

Activity	Less than 30 minutes	Between 30 minutes and 1 hour	1-2 hours	2-3 hours	4 hours +	Total
Dog walking	25 (18)	79 (57)	31 (22)	3 (2)	1 (1)	139 (100)
Walking	3 (11)	14 (50)	9 (32)	1 (4)	1 (4)	28 (100)
Outing with family	0 (0)	7 (64)	3 (27)	1 (9)	0 (0)	11 (100)
Jogging/power walking/running	6 (67)	3 (33)	0 (0)	0 (0)	0 (0)	9 (100)
Meeting with friends	3 (100)	0 (0)	0 (0)	0 (0)	0 (0)	3 (100)
Cycling/Mtn. Biking	3 (100)	0 (0)	0 (0)	0 (0)	0 (0)	3 (100)
Other	1 (33)	0 (0)	2 (67)	0 (0)	0 (0)	3 (100)
Photography	0 (0)	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Bird/Wildlife watching	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
<b>Total</b>	<b>41 (21)</b>	<b>104 (52)</b>	<b>45 (23)</b>	<b>6 (3)</b>	<b>3 (2)</b>	<b>199 (100)</b>

6.8 Nearly half (43%) of interviewees didn't tend to visit at a particular time of day and 5% were on their first visit and therefore didn't have a typical time of day they visited. For those who did tend to visit at a particular time, mornings were the commonest given response, with around a quarter (27%) of interviewees visiting before 10am in the morning (Table 10).

**Table 10: Numbers (row %) of interviewees and time of day (Q5) that they tend to visit by activity. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value. Interviewees could give multiple responses and the percentages, based on the number of interviews, can therefore total over 100.**

Activity	Early morning (before 7am)	Late morning (7am - 10am)	Midday (10am - 2pm)	Early afternoon (2pm - 4pm)	Late afternoon (4pm - 6pm)	Evening (after 6pm)	Varies / Don't know	First visit	Number interviewees
Dog walking	10 (7)	29 (21)	25 (18)	14 (10)	24 (17)	14 (10)	58 (42)	5 (4)	139 (100)
Walking	0 (0)	8 (29)	4 (14)	1 (4)	5 (18)	4 (14)	12 (43)	0 (0)	28 (100)
Outing with family	0 (0)	1 (9)	0 (0)	1 (9)	0 (0)	0 (0)	9 (82)	2 (18)	11 (100)
Jogging/power walking/running	1 (11)	2 (22)	0 (0)	0 (0)	0 (0)	3 (33)	4 (44)	0 (0)	9 (100)
Meeting with friends	0 (0)	1 (33)	0 (0)	0 (0)	0 (0)	1 (33)	0 (0)	1 (33)	3 (100)
Cycling/Mtn. Biking	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (33)	2 (67)	3 (100)
Other	0 (0)	1 (33)	0 (0)	0 (0)	0 (0)	1 (33)	1 (33)	0 (0)	3 (100)
Photography	0 (0)	0 (0)	1 (50)	0 (0)	1 (50)	0 (0)	0 (0)	0 (0)	2 (100)
Bird/Wildlife watching	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
<b>Total</b>	<b>11 (6)</b>	<b>42 (21)</b>	<b>30 (15)</b>	<b>16 (8)</b>	<b>30 (15)</b>	<b>23 (12)</b>	<b>86 (43)</b>	<b>10 (5)</b>	<b>199 (100)</b>

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- 6.9 Most interviewees (78%) indicated that they visited Strensall Common equally all year round (Table 11), and there was little evidence to suggest particular seasons were favoured by any particular activity group. Of the four seasons, summer was the one named by the smallest number of dog walkers (5%).

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**Table 11: Numbers (row %) of interviewees and time of year (Q6) that they tend to visit by activity. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value. Interviewees could give multiple responses and the percentages, based on the row totals, can therefore total over 100.**

Activity	Spring (Mar-May)	Summer (Jun-Aug)	Autumn (Sept-Nov)	Winter (Dec-Feb)	Equally all year	First visit	Total
Dog walking	16 (12)	7 (5)	17 (12)	15 (11)	112 (81)	5 (4)	139 (100)
Walking	2 (7)	3 (11)	2 (7)	1 (4)	24 (86)	0 (0)	28 (100)
Outing with family	1 (9)	0 (0)	1 (9)	1 (9)	8 (73)	2 (18)	11 (100)
Jogging/power walking/running	3 (33)	3 (33)	3 (33)	0 (0)	6 (67)	0 (0)	9 (100)
Meeting with friends	1 (33)	1 (33)	1 (33)	0 (0)	1 (33)	1 (33)	3 (100)
Cycling/Mtn. Biking	0 (0)	1 (33)	1 (33)	0 (0)	0 (0)	2 (67)	3 (100)
Other	0 (0)	0 (0)	0 (0)	0 (0)	3 (100)	0 (0)	3 (100)
Photography	0 (0)	0 (0)	0 (0)	0 (0)	2 (100)	0 (0)	2 (100)
Bird/Wildlife watching	1 (100)	1 (100)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)
<b>Total</b>	<b>24 (12)</b>	<b>16 (8)</b>	<b>25 (13)</b>	<b>17 (9)</b>	<b>156 (78)</b>	<b>10 (5)</b>	<b>199 (100)</b>

6.10 Half (51%) of those interviewed had been visiting Strensall Common for at least 10 years (Table 12). This was especially the case for those who were walking (68% visiting for at least 10 years), and indicates that the Common is long established as a destination for recreation.

**Table 12: Number (row %) of interviewees and length of time that they have been visiting Strensall Common (Q7) by activity. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value.**

Activity	less than or approx. 6 months	6 mnths-1 year	1-3 years	3- 5 years	5- 10 years	more than 10 years	First visit/no answer	Total
Dog walking	3 (2)	5 (4)	12 (9)	20 (14)	20 (14)	73 (53)	6 (4)	139 (100)
Walking	2 (7)	0 (0)	3 (11)	3 (11)	1 (4)	19 (68)	0 (0)	28 (100)
Outing with family	1 (9)	1 (9)	1 (9)	1 (9)	2 (18)	3 (27)	2 (18)	11 (100)
Jogging/power walking/running	0 (0)	1 (11)	1 (11)	1 (11)	3 (33)	3 (33)	0 (0)	9 (100)
Meeting with friends	1 (33)	0 (0)	0 (0)	0 (0)	0 (0)	1 (33)	1 (33)	3 (100)
Cycling/Mtn. Biking	0 (0)	0 (0)	1 (33)	0 (0)	0 (0)	0 (0)	2 (67)	3 (100)
Other	0 (0)	0 (0)	0 (0)	1 (33)	1 (33)	1 (33)	0 (0)	3 (100)
Photography	0 (0)	0 (0)	0 (0)	1 (50)	0 (0)	1 (50)	0 (0)	2 (100)
Bird/Wildlife watching	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)	0 (0)	1 (100)
<b>Total</b>	<b>7 (4)</b>	<b>7 (4)</b>	<b>18 (9)</b>	<b>27 (14)</b>	<b>27 (14)</b>	<b>102 (51)</b>	<b>10 (5)</b>	<b>199 (100)</b>

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## Mode of transport (Q8)

6.11 Overall, two-thirds (67%) of interviewees had travelled by car, with a further 32% arriving on foot and one interviewee (1%) arriving by bicycle. The majority of survey effort was focussed at the car-parks, which were located on the major paths/entry points, so it is notable that still around a third of interviewees had walked from home to visit Strensall Common. Comparing between survey points, Galtres had the highest percentage of interviewees that arrived by car (89%) (Figure 6, Table 13). At the Scott Moncrieff car-park the ratio of car-borne visitors to those arriving of foot was closer to even, with 58% driving and 41% walking.

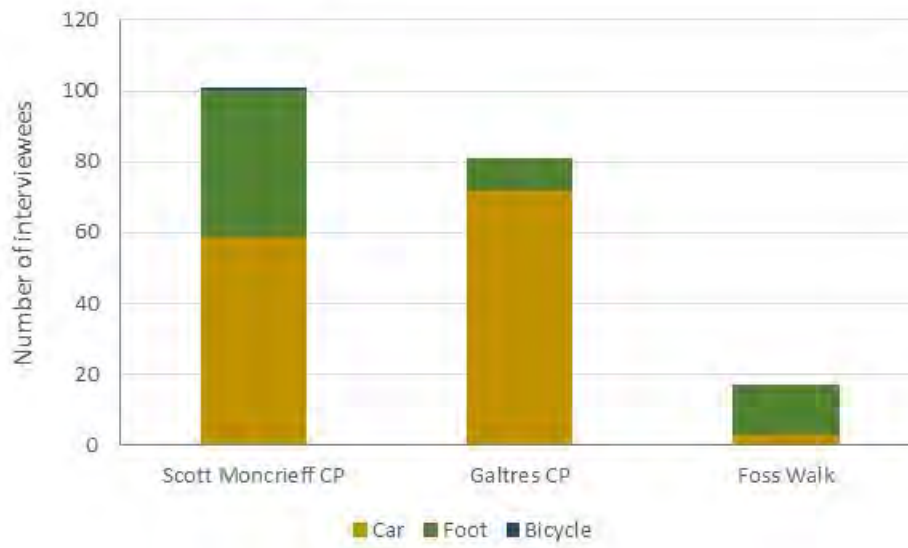


Figure 6: Numbers of interviewees by mode of transport (Q8) and survey point.

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**Table 13: Number (row %) of interviewees and mode of transport (Q8), by survey point and activity. Grey shading reflects the highest value for each activity at each survey point. Percentages are calculated for each survey point.**

Activity	Galtres CP		Foss Walk		Scott Moncrieff CP		
	Car/van	On foot	Car/van	On foot	Bicycle	Car/van	On foot
Dog walking	50 (62)	5 (6)	2 (12)	7 (41)	0 (0)	50 (50)	25 (25)
Walking	7 (9)	2 (2)	0 (0)	6 (35)	0 (0)	4 (4)	9 (9)
Outing with family	5 (6)	0 (0)	0 (0)	0 (0)	0 (0)	2 (2)	4 (4)
Jogging/power walking/running	1 (1)	2 (2)	0 (0)	1 (6)	0 (0)	2 (2)	3 (3)
Cycling/Mtn. Biking	2 (2)	0 (0)	0 (0)	0 (0)	1 (1)	0 (0)	0 (0)
Other	2 (2)	0 (0)	1 (6)	0 (0)	0 (0)	0 (0)	0 (0)
Meeting up with friends	2 (2)	0 (0)	0 (0)	0 (0)	0 (0)	1 (1)	0 (0)
Photography	2 (2)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Bird/Wildlife watching	1 (1)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Total</b>	<b>72 (89)</b>	<b>9 (11)</b>	<b>3 (18)</b>	<b>14 (82)</b>	<b>1 (1)</b>	<b>59 (58)</b>	<b>41 (41)</b>
<b>Survey point total</b>	<b>81 (100)</b>		<b>17 (100)</b>		<b>101 (100)</b>		

6.12 Group size for those arriving by car ranged from 1 (i.e. the interviewee visiting on their own) to 8, and the mean car-occupancy was 1.6 people per vehicle.

### Reasons for site choice (Q13)

6.13 Reasons for site are summarised in Figure 7. Interviewees were asked why they chose to visit the specific location where interviewed, rather than another local site, with answers categorised by the surveyor using pre-determined categories which were not shown to the interviewee. One main reason was identified, and multiple 'other' reasons could be recorded. Overall the rural feel/wild landscape was the most common given reason, cited by 52% of interviewees. Close to home was also important and given by 51%. Close to home was however very clearly the most common single main reason, with 38% of interviewees stating close to home was the single main reason for underpinning their choice of site. Scenery was important for 49% (main and other reasons combined) and good for the dog was a factor for 47%.

6.14 11 interviewees (6%) gave other reasons for their choice, and these were varied, including "litter free"; "site on the way to visit relatives"; "fresh air after

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a trip to B&Q”; “space to run around”; “absence of sheep” and “training for a particular event” and “rotate dog walks”. For 3 of interviewees (all dog walkers who visited daily), there was clearly a social draw, as the other reason given related to meeting people on the walk.

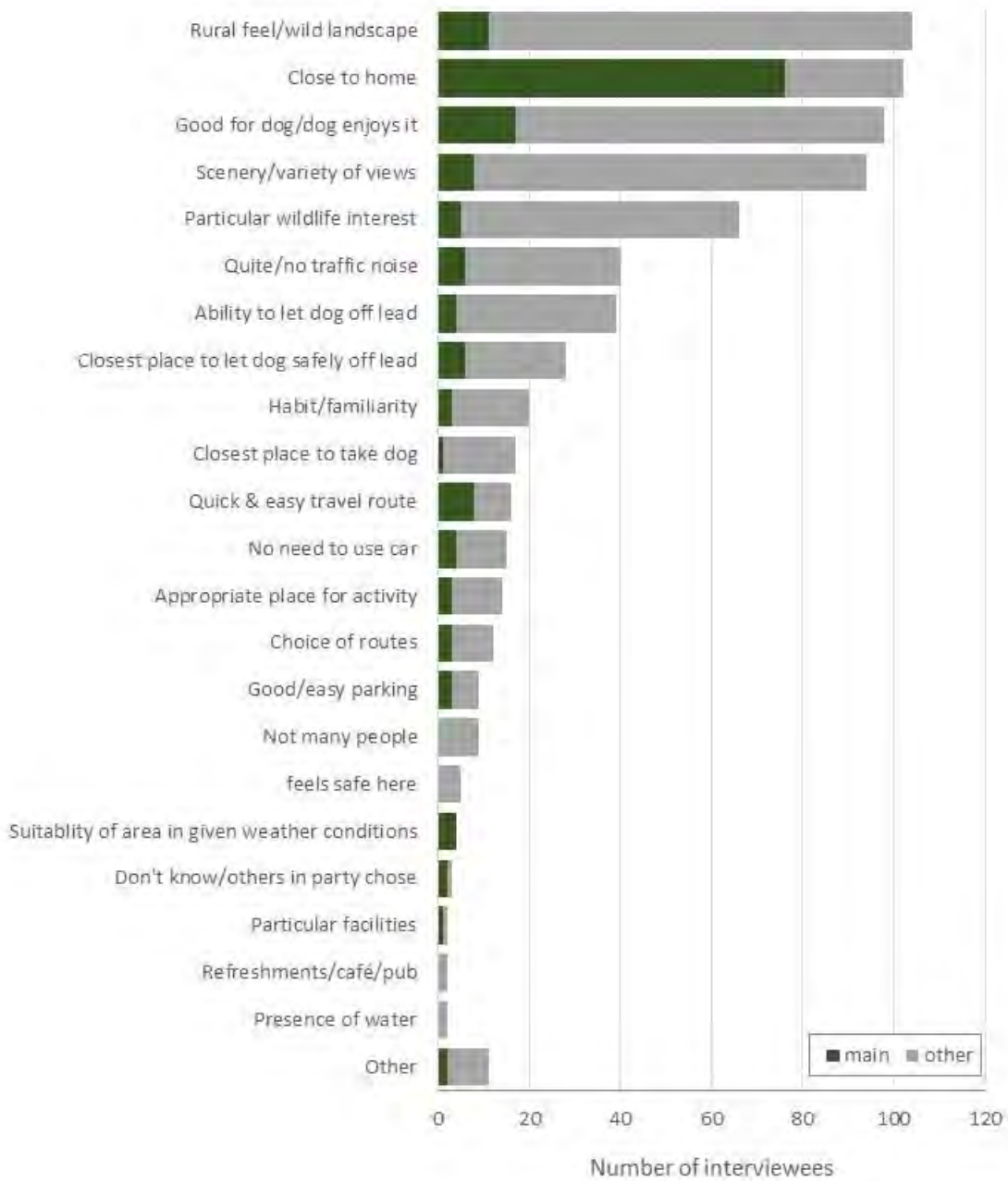


Figure 7: Reasons for site choice (Q13).



## Use of other sites (Q14-15)

6.15 It is to be expected that people will tend to visit a range of greenspace sites for recreation. A quarter (25%) of interviewees stated that all their visits (for the activity they were undertaking when interviewed) took place at Strensall Common and for a further third (32%) of interviewees 75% or more of their visits were at Strensall Common. Therefore, for over half (52%) of interviewees, 75% or more of their visits were to Strensall Common, suggesting a strong degree of site faithfulness among visitors (Table 14). The other sites visited were quite limited (see Figure 8) and by far the most commonly visited alternatives were the River Foss or Strensall Village itself.

**Table 14: Table 15: Number (row %) of interviewees and proportion of weekly visits at Strensall Common (Q14) by activity. Grey shading reflects the highest two values in each row, with the darker shading highlighting the highest row value.**

Activity	All take place here	75% or more	50-74%	25-49%	less than 25%	Not sure/don't know/first visit/no response	Total
Dog walking	43 (31)	47 (34)	14 (10)	11 (8)	18 (13)	6 (4)	139 (100)
Walking	5 (18)	6 (21)	9 (32)	2 (7)	5 (18)	1 (4)	28 (100)
Outing with family	1 (9)	1 (9)	3 (27)	1 (9)	3 (27)	2 (18)	11 (100)
Jogging/power walking/running	1 (11)	7 (78)	0 (0)	0 (0)	1 (11)	0 (0)	9 (100)
Cycling/Mtn. Biking	0 (0)	0 (0)	0 (0)	1 (33)	0 (0)	2 (67)	3 (100)
Other	0 (0)	0 (0)	0 (0)	1 (33)	0 (0)	2 (67)	3 (100)
Meeting up with friends	0 (0)	2 (67)	0 (0)	0 (0)	1 (33)	0 (0)	3 (100)
Photography	0 (0)	0 (0)	0 (0)	0 (0)	2 (100)	0 (0)	2 (100)
Bird/Wildlife watching	0 (0)	0 (0)	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
<b>Total</b>	<b>50 (25)</b>	<b>63 (32)</b>	<b>27 (14)</b>	<b>16 (8)</b>	<b>30 (15)</b>	<b>12 (6)</b>	<b>199 (100)</b>

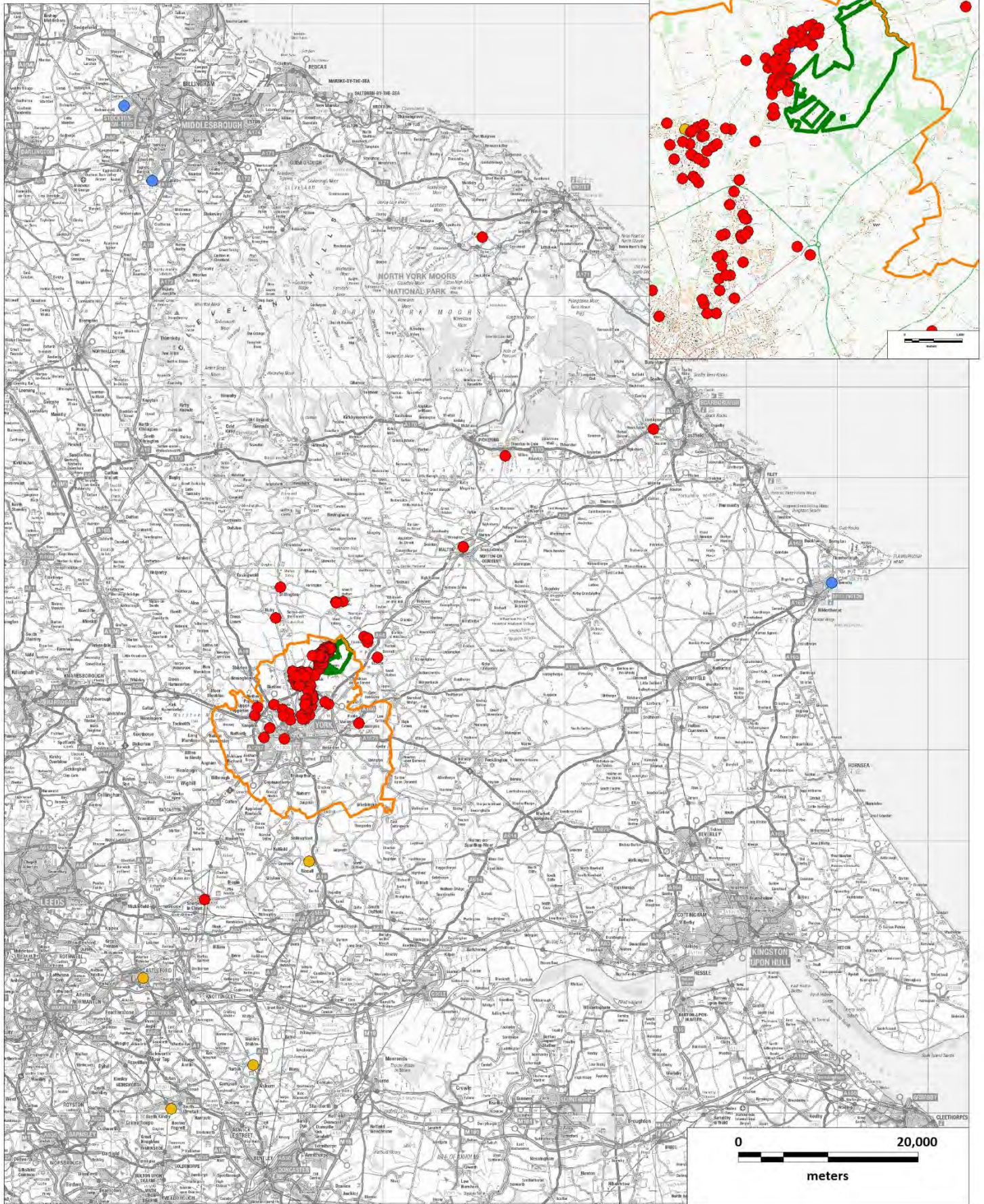


## Visitor origins (Q18)

- 6.16 A total of 192 interviewee postcodes could be accurately mapped, with the full postcode given in the interview matching the standard national postcode database. A total of 7 (4%) of interviews were therefore not assigned to a home postcode.
- 6.17 Postcode data are mapped in Maps 6-10. Map 6 shows all visitor postcodes, with the inset showing the area directly around Strensall Common. Maps 7-10 show a smaller geographic area than the main map on Map 6 (and as such Maps 7-10 exclude 10 interviewee postcodes which lie outside the area shown). In Map 7 the colours reflect the activities of interviewees, in Map 8 the colours show frequency of visit, in Map 9 the shading reflects the percentage of weekly visits made to Strensall Common (for the given activity) and Map 10 shows the postcodes by survey point.
- 6.18 It can be seen that the distribution of postcodes reflects interviewees living in Strensall and in nearby settlements (Haxby, Wigginton, Park Estate). There was also a wedge of interviewee postcodes from south of the York bypass towards the city centre, around Earswick and Huntington. Interviewees travelling from Earswick and Huntington included regular visitors and a reasonable proportion of dog walkers. Those visiting from the western part of York and further to the south in the city clearly also use other greenspaces for their chosen activity while those living close to Strensall mostly visit Strensall Common (Map 9). Compared to the main car-parks, interviewees at the Foss Walk survey point were much more local (Map 10).






Map 6: Home postcodes (all)



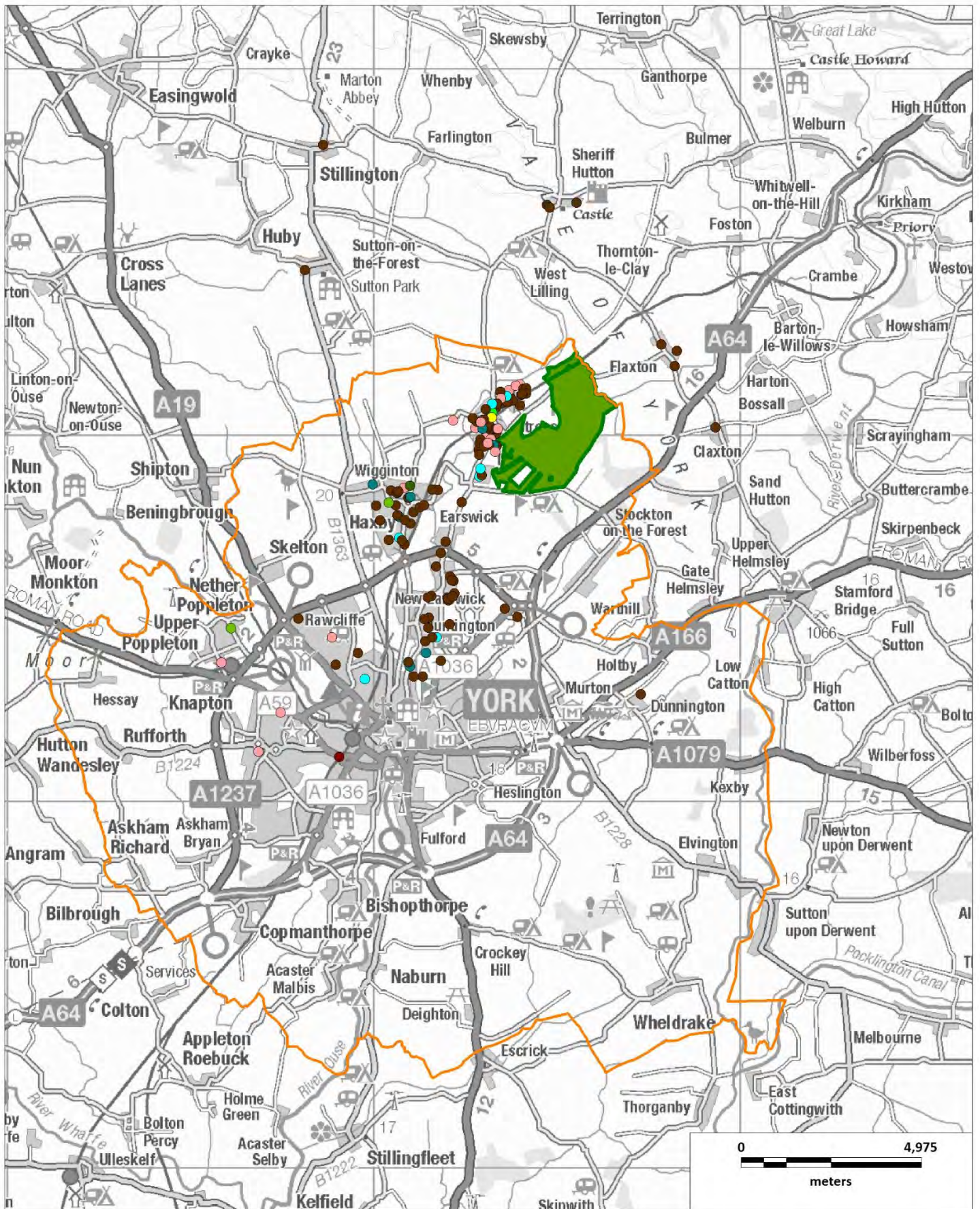
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 City of York

**Home postcodes**

-  Day trip/short visit travelling directly from home that day (183)
-  Day trip/short visit and staying away with friends/family (5)
-  Staying away from home in second home, mobile home or on holiday (4)

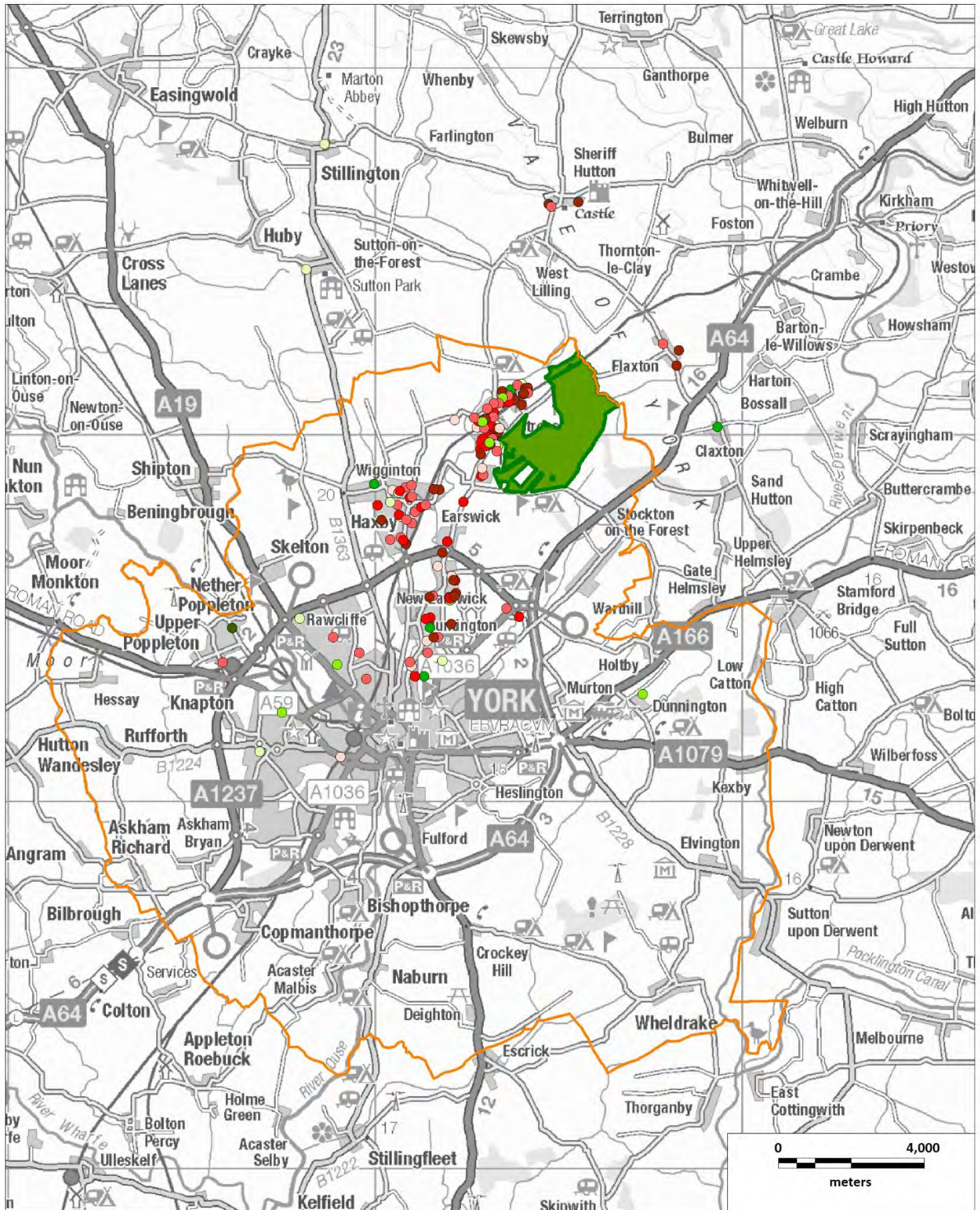


Map 7: Home postcodes by activity (10 postcodes lie outside mapped area)

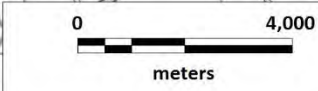
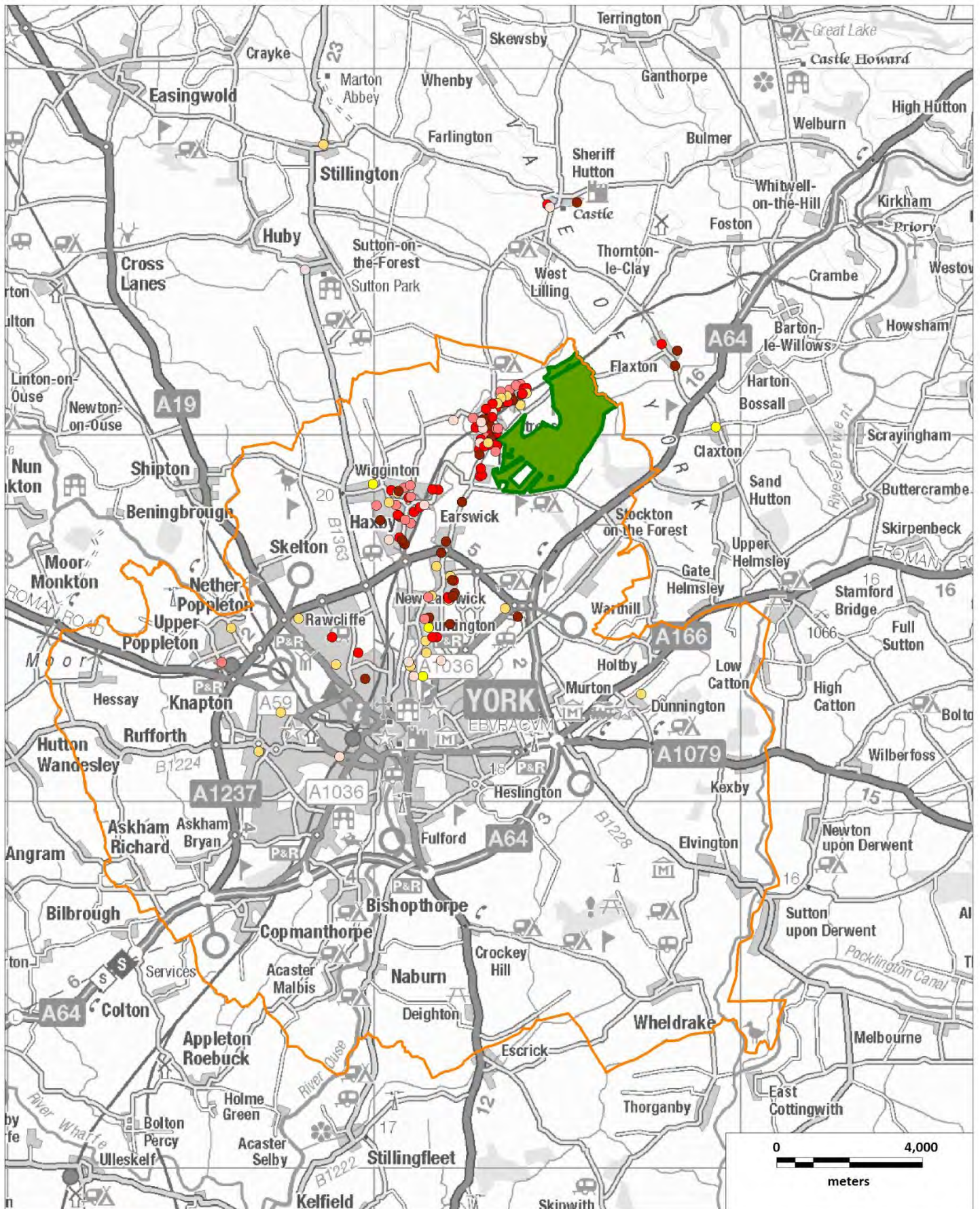




Map 8: Home postcodes by frequency of visit (10 postcodes lie outside mapped area)







Strensall Common SAC

City of York

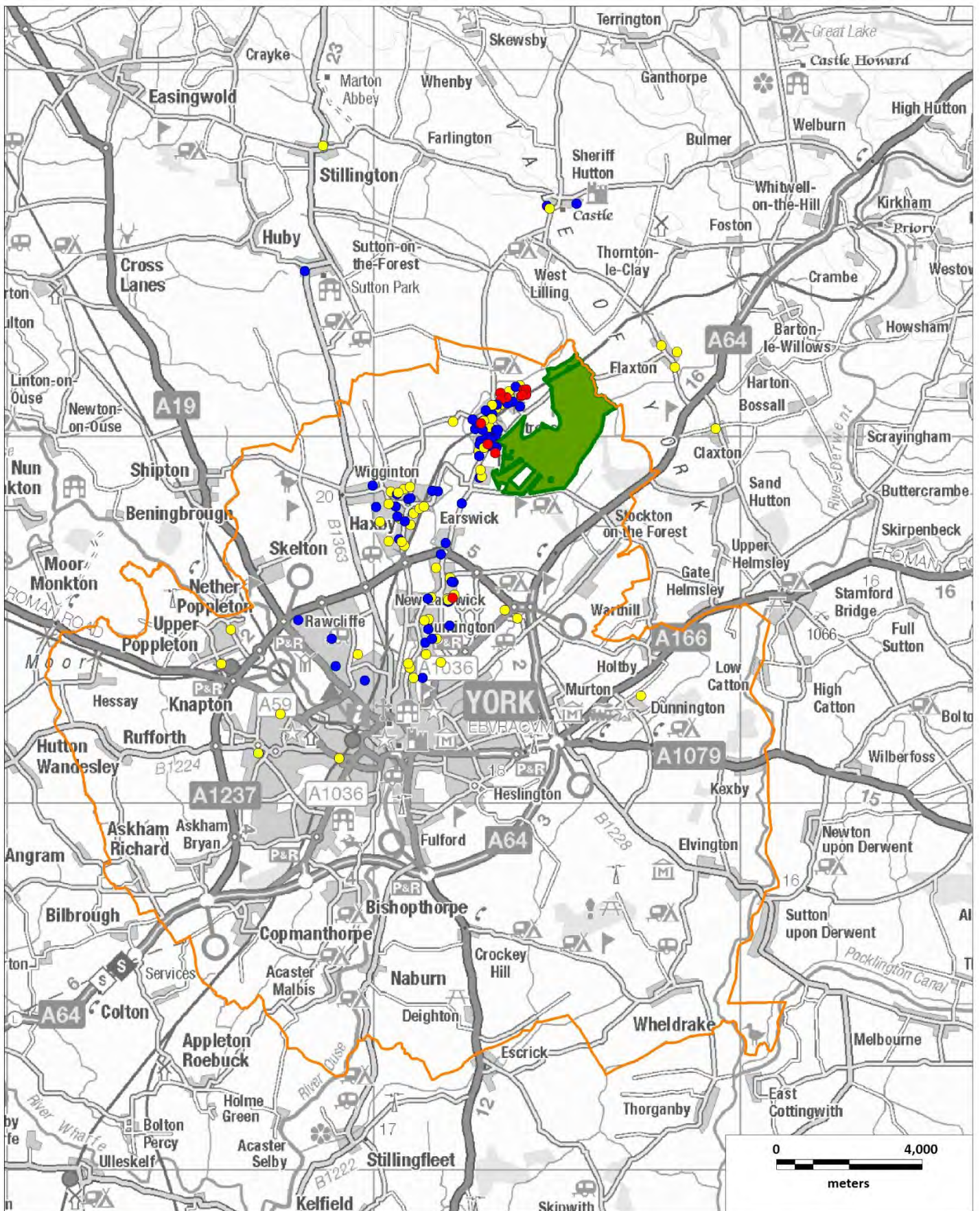
**Interviewee postcodes and percentage of visits for given activity to Strensall Common**

<span style="color: red;">●</span> All take place here (49)	<span style="color: lightgrey;">●</span> 25-49% (16)
<span style="color: red;">●</span> 75% or more (61)	<span style="color: yellow;">●</span> less than 25% (28)
<span style="color: pink;">●</span> 50-74% (26)	<span style="color: yellow;">●</span> Not sure/don't know/first visit (11)

Contains Ordnance Survey Data. © Crown Copyright and Database Right 2017.  
Designated site boundaries downloaded from the Natural England website. © Natural England.



Map 10: Home postcodes by survey point (10 postcodes lie outside mapped area)



- Strensall Common SAC
  - City of York
- Interviewee postcodes by survey point**
- Galtres car-park (78)
  - On Foss Walk (17)
  - Scott Moncrieff Road car-park (97)

V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
S t r e n s a l l   C o m m o n

- 6.19 The straight-line distance ('as the crow-flies') from the interviewee's home postcode to the survey point was calculated for each of the 192 interviewee postcodes and the data are summarised in Table 17. It can be seen that across all the data the mean distance was 5.7km and the median was 2.9km i.e. 50% of interviewees had come from a radius of 2.9km around the survey points. The mean is so much higher than the median as there are a few large values (up to 64km) that skew the data. The third quartile (75<sup>th</sup> percentile) was 5.8km; 75% of interviewees lived within this distance of the survey points.
- 6.20 Looking across the other groupings it can be seen that if holiday makers and those staying with friends and family are excluded (i.e. the data are limited to day visitors from home only), the median is slightly lower at 2.4km and 75% of visitors came from a radius of 5.5km. Dog walkers (median 3km), runners (median 1.7km) and those walking (median 1.45km) were all relatively local and for all these groups the 75<sup>th</sup> percentile was between 5 and 6km. Those that visit less frequently (less than once a week) clearly come from further afield, with a median distance of 5.8km compared to a median of 1.8 for those coming at least weekly.

**Table 17: Summary statistics for the straight-line distance between the home postcode and survey point for different groups of interviewees. Shading and dark lines separate different types of grouping. N is the sample size (number of valid postcodes) and Q3 is the 75<sup>th</sup> percentile.**

Variable/type of interviewee	N	Distance (km)				
		Mean (+ 1SE)	Min	Median	Q3	Maximum
All interviewees with valid postcode	192	5.69 (+0.76)	0.28	2.86	5.79	64.15
Day visitors from home only	183	4.06 (+0.44)	0.28	2.41	5.5	48.01
Dog walkers	134	5.04 (+0.85)	0.28	3.00	5.71	64.15
Jogging/power walking	9	3.06 (+0.9)	0.86	1.67	5.67	7.53
Walking	28	5.34 (+2)	0.36	1.45	5.73	54.22
Visiting less frequently than once a week	50	12.37 (+2.37)	0.28	5.75	11.5	64.15
Visiting at least once a week	142	3.34 (+0.46)	0.34	1.82	4.82	55.35
Those travelling by car	130	6.14 (+0.73)	0.36	4.63	6.37	48.01
Those who arrived on foot	61	4.79 (+1.8)	0.28	0.73	1.35	64.15



## Visitor routes during their visit (Q9-12)

- 6.21 For 69% of interviewees the route they took was reflective of their normal route (Q9); a further 4% did not have a typical visit and 6% were on their first visit. Of those whose route was not reflective of a typical route, 40 interviewees (20%) indicated it was much shorter than normal and only 1 interviewee (<1%) indicated their route was much longer than normal.
- 6.22 16 interviewees (8%) stated they were following a marked route (Q10) and a further 3 (2%) of interviewees weren't sure/didn't know. Of those that were following a marked route, 3 stated they were following the red route, 2 the brown, 1 the black and the others weren't sure of the colour.
- 6.23 A range of factors influenced the interviewees' choice of routes (Figure 9). Time available was the most commonly given response (41 interviewees, 21%). Weather, previous knowledge/experience and activity undertaken were also common reasons (in all cases 19 interviewees, 10%). 'Other' reasons were varied but sheep were clearly a factor for many (cited by 12 interviewees).

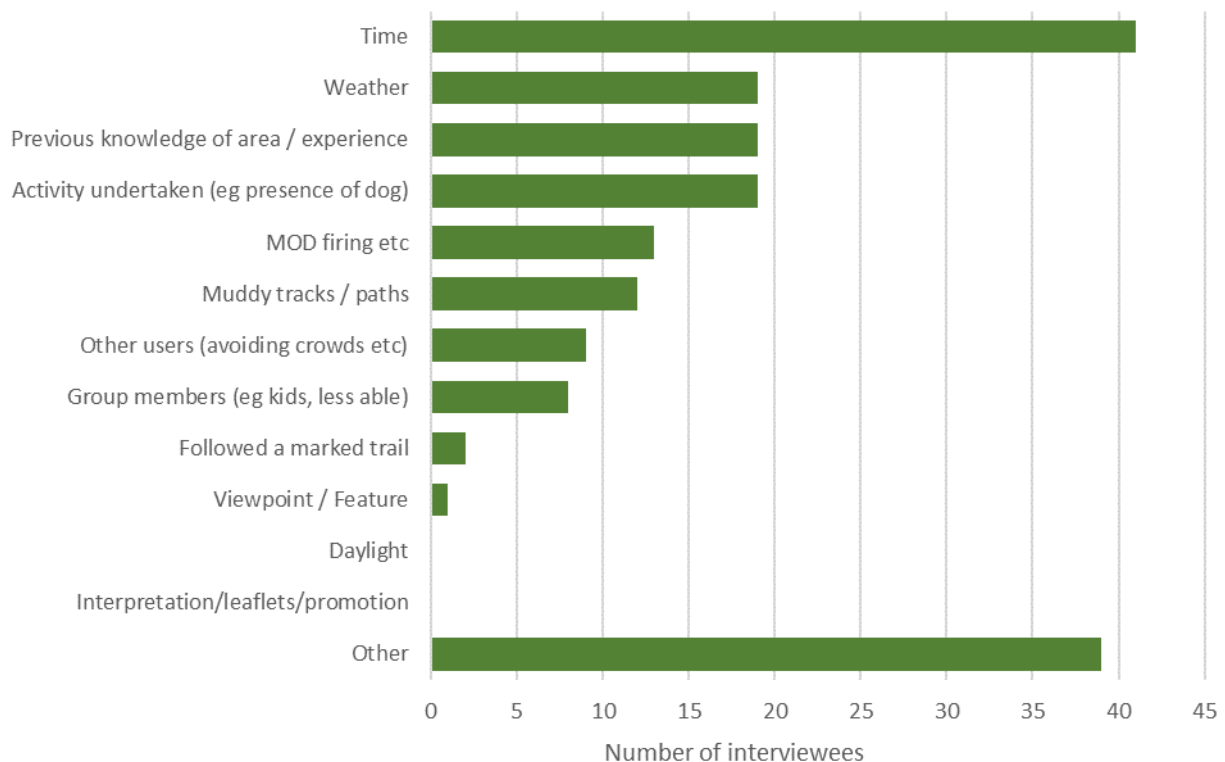


Figure 9: Factors influencing choice of route (Q12). Note interviewees could give multiple responses.

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6.24 A total of 191 routes were mapped, with a line showing the route taken by the interviewee. The mean route length as mapped was 3.7km ( $\pm$  1SE of 0.1), with a median of 3.5km. Routes ranged from 326m to 13.1km. Many of the routes – as mapped – included areas outside the SAC. This was particularly the case for walkers (see Figure 10) where the route often included the route from the house to the Common or encompassed the Foss Way. When the route data were clipped to the SAC boundary, the mean was 2.7km ( $\pm$  1SE of 0.1), with a median of 2.5km. Routes ranged from 83m to 9.2km.

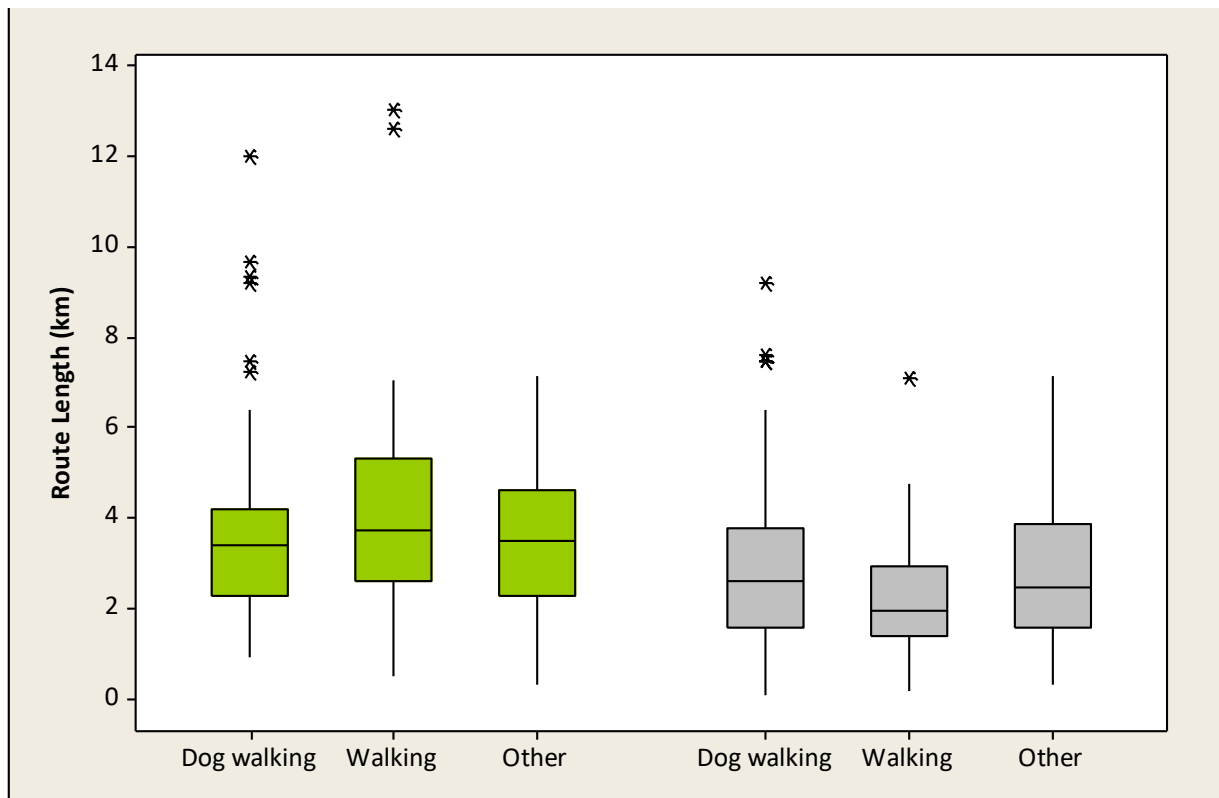
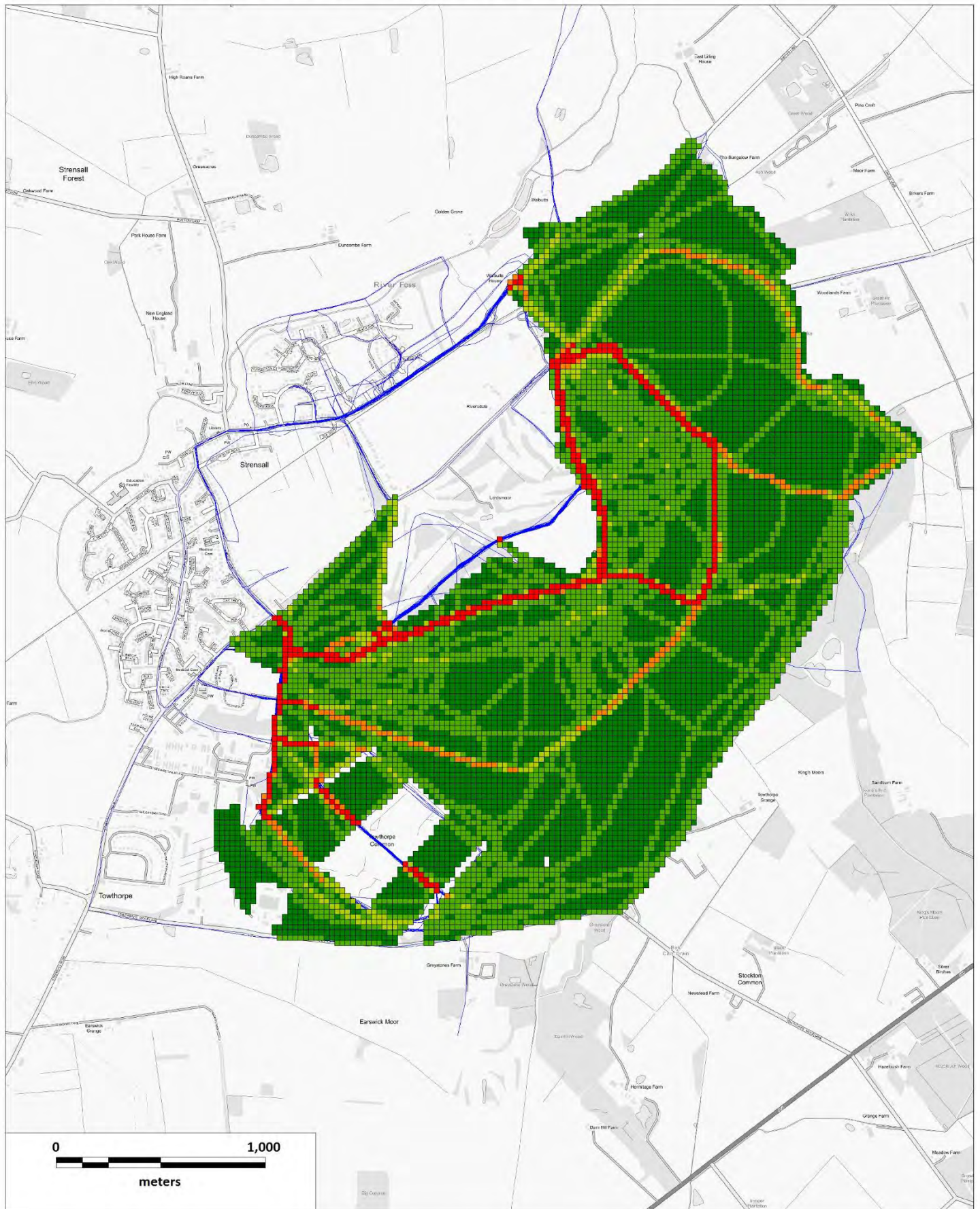


Figure 10: Box plot showing route lengths by selected activities. Green shading reflects total routes mapped, grey shading routes clipped to within the SAC only. Horizontal lines show the median, boxes show the inter-quartile range, whiskers reflect the limit of the data and the asterisks show outliers.

6.25 The mapped routes are shown in Map 11, where we have shown route density within the SAC based on a 25m grid. It is often challenging for interviewees to describe where they have walked, even if shown a map, and the range of route options on Strensall Common means that the routes as mapped are approximate. We have summarised them using the 25m grid as a way of highlighting areas with the most use and broadly indicating where the most footfall (of the interviewees) occurs.

Map 11: Route density (from interviewed visitors) across the SAC



Routes (outside SAC)

25m grid with number of routes through cell grid covers the extent of the SAC

- 15 to 100 (371)
- 10 to 15 (237)
- 5 to 10 (471)
- 1 to 5 (3698)
- 0 to 1 (4947)

## Comments/views on recreation management (Q16-17)

6.26 The last part of the questionnaire included free text boxes for the surveyors to log any changes interviewees would like to see regarding how the site is managed for recreation and people (Q16). The subsequent question asked for any further comments or feedback about the interviewee's visit (Q17). All comments are listed in Appendix 2 (Q16) and Appendix 3 (Q17).

6.27 We also summarise the combined comments to both questions in Figure 11. Key themes included:

- Sheep, in particular the difficulties for dog walkers in knowing where the sheep are, and difficulties in avoiding them (30 interviewees)
- Dog fouling (10+ interviewees)
- Anti-social behaviour, e.g. motorbikes, 'youths', overnight parking, fires etc. (8 interviewees)
- Concern about snakes/adders (7 interviewees) with at least one under the impression that adders are released on the site
- Military use, e.g. fences, red flags, uncertainty about access restrictions (7+ interviewees)





## 7. Housing change and implications for the levels of recreation use

- 7.1 The analysis of visitor origins (based on the postcode data of interviewees, paras 6.16-6.20 above) highlights that visitors come from a wide area, however a high proportion of visitors are very local, coming from Strensall itself. We would expect people who live close to Strensall Common to be more likely to visit than those who live further away. In this section we use the postcode data to explore how the distance from the SAC relates to the likelihood of visiting Strensall Common, and use this to predict how visitor numbers might change as a result of new housing.

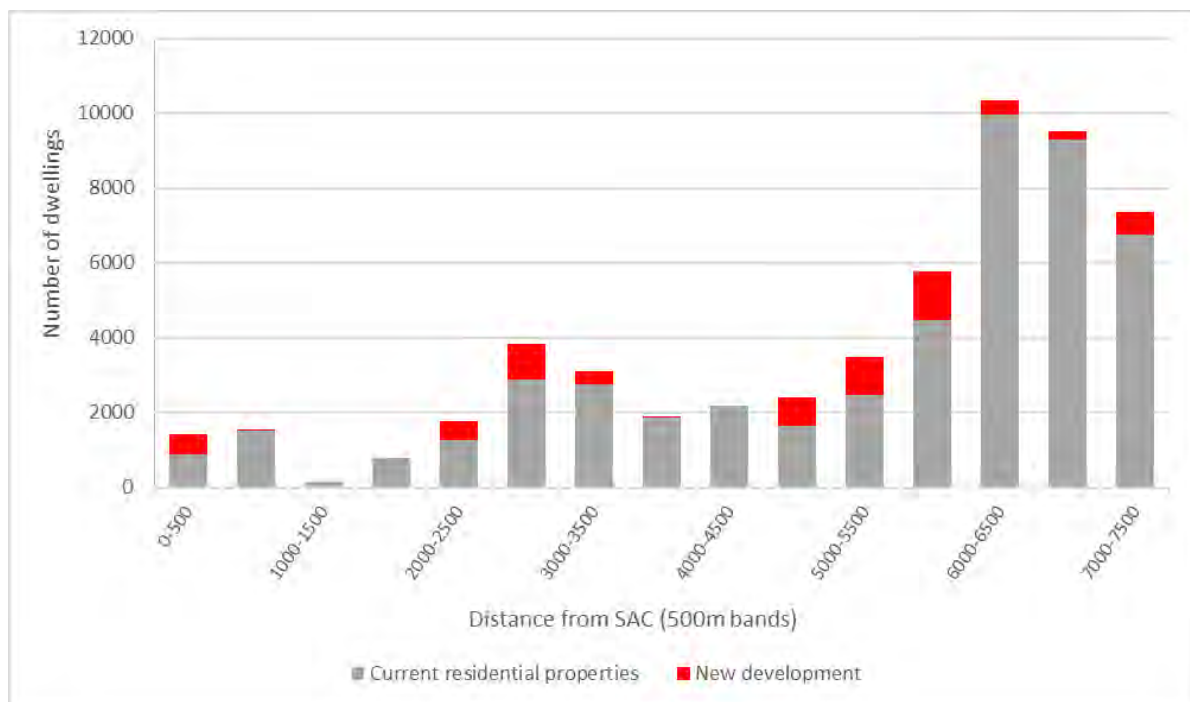
### Plan allocations and current levels of housing

- 7.2 Plan allocations are summarised in Map 2. Using 500m buffers drawn around Strensall Common SAC we extracted figures for the amount of current and future (i.e. the plan allocations) for each 500m distance band (to 7.5km from the SAC). Current housing was based on 2017 postcode data and the number of residential properties assigned to each postcode within the band. Where allocations spanned multiple distance bands we allocated the number of dwellings to each band based on the proportion of the area of the allocation that overlapped the band.
- 7.3 The data are summarised in Table 18 (which also gives the number of interviewees originating from each distance band) and in Figure 12. The figure shows levels of current housing are relatively low in the immediate distance bands but rise markedly from around 6km, reflecting the location of York and larger areas covered by the buffers (which represent concentric rings of ever-increasing size). It can be seen that the most marked change is in the very local 0-500m distance band, where the 543 potential new dwellings represents an increase of 61%.

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**Table 18: Number of current residential properties, future development (plan allocations) and interviewees by 500m distance band.**

Distance band from SAC	Current residential properties	New development (plan allocations)	% change in housing	Number of interviewees	Interviewees per current property
0-500	883	543	61	44	0.0498
500-1000	1523	2	0	49	0.0322
1000-1500	149	0	0	3	0.0201
1500-2000	791	0	0	4	0.0051
2000-2500	1269	492	39	18	0.0142
2500-3000	2900	928	32	15	0.0052
3000-3500	2772	334	12	17	0.0061
3500-4000	1863	53	3	2	0.0011
4000-4500	2180	0	0	8	0.0037
4500-5000	1637	780	48	3	0.0018
5000-5500	2463	1016	41	2	0.0008
5500-6000	4485	1293	29	3	0.0007
6000-6500	9956	395	4	3	0.0003
6500-7000	9305	213	2	3	0.0003
7000-7500	6743	604	9	0	0
<b>Total</b>	<b>48,919</b>	<b>6653</b>	<b>14</b>	<b>174</b>	



**Figure 12: Levels of current and future (new) housing. Current residential properties are extracted from 2017 postcode data. New development is that shown in Map 2, i.e. plan allocations.**

## Implications for visitor use

7.4 In Table 18 (above) we have given the number of interviewees from each distance band. Dividing the number of interviewees by the volume of current housing gives a value for the number of interviewees per residential property, essentially a measure of visit rate. As would be expected, this value decreases with distance (Figure 13), reflecting that people who live further away from Strensall Common are less likely to visit. Visit rates appear to flatten out and are consistently low from 4km.

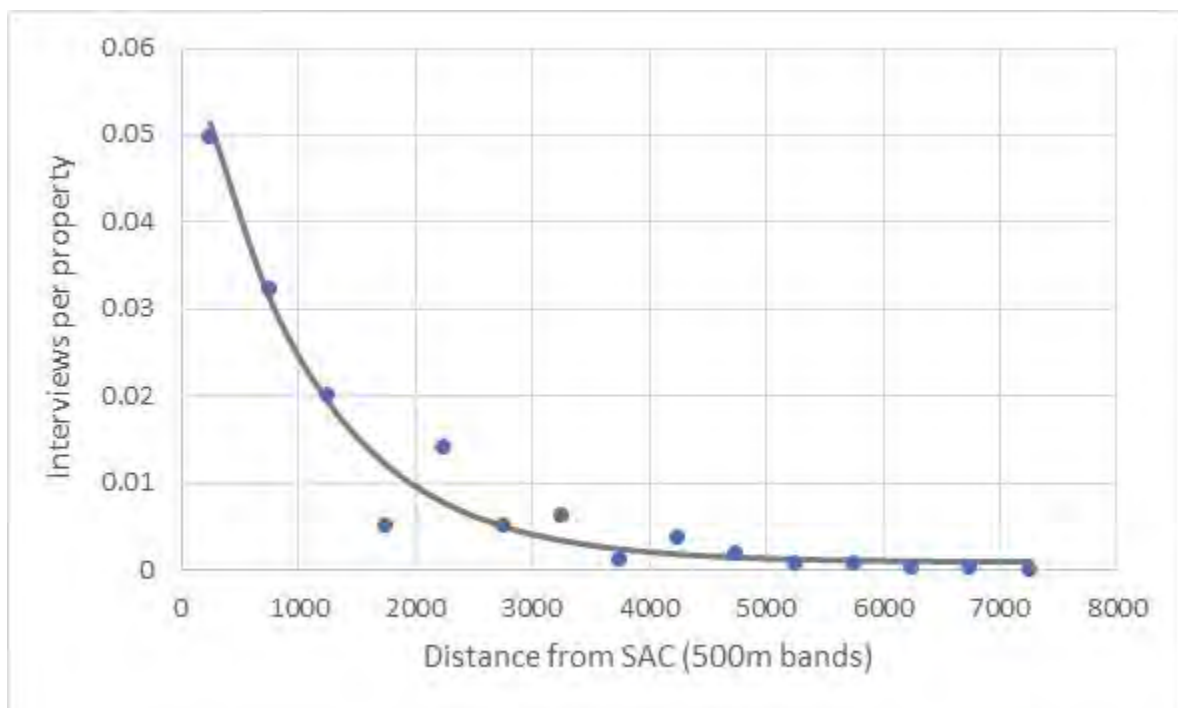


Figure 13: Interviews per property in relation to distance from the SAC. Interviews per property is calculated by dividing the number of interviewees who originated in each 500m band by the number of residential properties in the band. Trendline fitted manually by eye.  $Y=0.065e^{-0.001x} + 0.0008$ .  $r^2 = 0.962$ .

7.5 Using the fitted line in Figure 13, we can predict how many interviewees might be expected, were the survey repeated in the future, taking into account the cumulative levels of development (within 7.5km) as set out in the current submission version of the plan. The prediction would be for a further 42 interviewees, a 24% increase (Table 19). The majority of these (28 of the 42 additional interviewees) would originate from the 0-500m distance band, reflecting the particular impact of development in very close proximity of the SAC.

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**Table 19: Number of current interviewees and predicted increase based on fitted curve in Figure 13.**

Distance band from SAC	Number of interviewees	Predicted additional increase as a result of new housing	% change
0-500	44	27.92	63
500-1000	49	0.06	0
1000-1500	3	0	0
1500-2000	4	0	0
2000-2500	18	3.76	21
2500-3000	15	4.6	31
3000-3500	17	1.11	7
3500-4000	2	0.12	6
4000-4500	8	0	0
4500-5000	3	1.06	35
5000-5500	2	1.16	58
5500-6000	3	1.3	43
6000-6500	3	0.37	12
6500-7000	3	0.19	6
7000-7500	0	0.51	
	<b>174</b>	<b>42.16</b>	<b>24</b>

7.6 We can test the overall change in access to Strensall Common as a result of different sites being excluded from the Plan (Table 20). This provides a check on the scale of change associated with different development scenarios. The first row in Table 20 shows the same scenario as above (in Table 19), i.e. all allocations within 7.5km. Subsequent rows show the effect of dropping different allocations. It can be seen that without ST35 (500 dwellings at the Queen Elizabeth Barracks) all the other allocations would be predicted to result in an overall change in access of 7%:

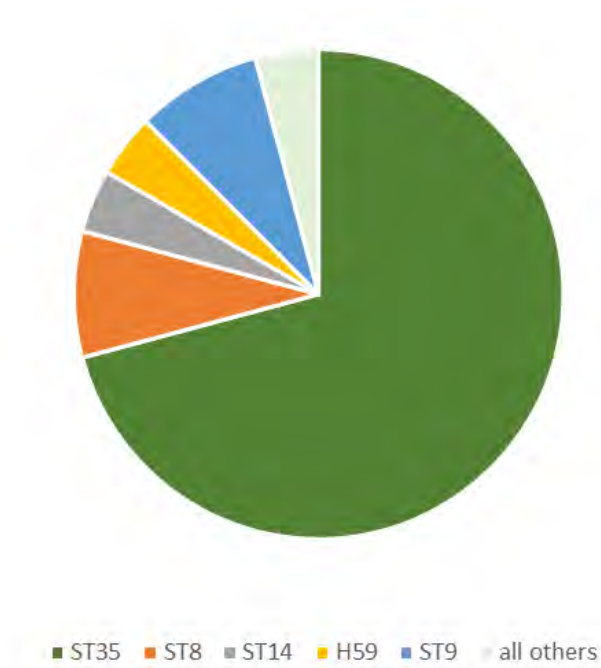
**Table 20: Increases in access with different levels of development, checking the potential effect of removing different allocations from the plan.**

Scenario	Overall number of dwellings	% change in access
All allocations,	6653	24
All allocations apart from ST35, Queen Elizabeth Barracks	6153	7
All allocations apart from ST8, Land North of Monks Cross	5685	22
All allocations apart from ST14, Land to the West of Wiggington Rd	5305	23
All allocations apart from H59, Queen Elizabeth Barracks	6608	23
All allocations apart from ST9, North of Haxby	5918	22



V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
S t r e n s a l l   C o m m o n

- 7.7 The relative contribution of different allocations is also shown in Figure 14. This highlights the potential strong influence of the development in close proximity.



**Figure 14: Relative contribution of different allocation sites (all within 7.5km of Strensall Common) to the change in access predicted from the overall quantum of development. The overall change is an increase of 24%.**

## Caveats with the approach

- 7.8 We have estimated the increase in use by extrapolating visitor data from a snapshot in time. The data show that a 14% increase in housing is envisaged within the submission version of the plan, within 7.5km of the SAC. We predict a 24% increase in access as a result, the discrepancy between the two figures reflecting the close proximity of the some of the development to the SAC.
- 7.9 This increase is essentially the number of interviews that would be expected were the survey to be repeated, after the allocations had been built. As the interviews were with a random sample of visitors, it is reasonable to assume that this level of change would be the overall change in access that might be expected. We highlight that the predictions are made assuming even distribution of housing within the allocation sites, i.e. for each site housing



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would evenly spread across the whole allocation area. We have assumed no mitigation in place that would deflect access, essentially envisaging residents in any new development would have similar access patterns/visit Strensall Common in the same way as other local residents.

- 7.10 Our estimates also only take into account new development within York (within 7.5km) rather than further afield.

## 8. Vegetation types at Strensall Common

- 8.1 The vegetation types of Strensall Common are summarised in this section and mapped using the new UKHab classification (referred to in bold in the text), with cross reference to the National Vegetation Classification (Rodwell 1991) and the Annex I habitats<sup>5</sup> for which the site is designated. UKHab was used (as opposed to Phase 1<sup>6</sup>) as it was specifically designed to allow easy correlation between the different systems. Reference to Wilson (2009) should be made for more detailed vegetation descriptions, which are still valid for the site - changes since 2009 appear to be an increase in the amount of young secondary woodland, a small increase in short acid grassland and the drying out of wetland communities and ponds (although note that the 2018 survey followed a particularly dry summer).
- 8.2 Strensall Common is underlain by a complex mosaic of sands and clays which result in a diverse pattern of dry and wet heath and wetland communities. The common is essentially formed of two large shallow depressions supporting predominantly wet heath divided by free-draining sandy ridges crossing the site diagonally from north-west to south-east. There are additional sandy ridges throughout the wetter areas. Both wet and dry areas support heathland and there is also much secondary and planted woodland.
- 8.3 The SAC is designated for 4010 Northern Atlantic wet heath with *Erica tetralix* and 4010 European dry heaths. At Strensall, these habitats are represented by the NVC communities M16 Lowland Wet Heath - *Erica tetralix* - *Sphagnum compactum* wet heath and H9 Wavy hair-grass heath - *Calluna vulgaris*-*Deschampsia flexuosa* heath. A heather *Calluna vulgaris*-dominated dry subcommunity, H9a, forms dry heath while a damper subcommunity H9e with Purple Moor-grass *Molinia caerulea* and Cross-leaved Heath *Erica tetralix* represents a type of humid heath. H9 is listed as a component community of European dry heaths. However, the Annex I description<sup>7</sup> notes that not all forms of the communities listed (which includes H9) fall within European dry heaths. At Strensall, we consider that, together with the wetter M16 (which includes bog mosses), H9e falls within the UKHab community **h1a7 Wet**

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<sup>5</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUcode=UK0030284>

<sup>6</sup> <http://jncc.defra.gov.uk/page-4258>

<sup>7</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/habitat.asp?FeatureIntCode=H4030>

**heathland with Cross-leaved Heath, lowland**<sup>8</sup> while H9a falls within **h1a5 dry heathland, lowland**. In practice, H9e forms a transition between the two UKHab and Annex I communities. Dry heathland is largely confined to low ridges in the north of the site. Wet heathland is widespread, found on peaty, permanently wet soils and drier, more freely draining soils that are wet at times.

- 8.4 The wet areas also support large areas of tussocky, M25 Purple moor-grass sward - *Molinia caerulea*-*Potentilla erecta* mire vegetation. This falls within UKHab **f2b Purple moor grass and rush pastures** although it is perhaps best considered as part of the wet heath habitat rather than as Purple Moor-grass pasture. Much of this wetter habitat is affected by drainage – there are boundary drains and herringbone drain systems are clear from aerial images throughout the main wet heath areas. The drains are in many cases partly hidden on the ground by tussocky vegetation which is widespread in these areas.
- 8.5 Much of what was once presumably wet heath or Purple Moor-grass dominated rush pasture now supports secondary Birch-dominated woodland (W4 Hoary birch woodland *Betula pubescens*-*Molinia caerulea* woodland). This often has a Purple Moor-grass dominated ground flora. Some drier areas support planted Oak and Scots Pine woodland (W16 Oak-birch hair-grass woodland *Quercus*-*Betula*-*Deschampsia flexuosa* woodland). This falls within the UKHab category **w1f7 other lowland mixed deciduous woodland**. There are limited areas of W4a which fall within **w1d Wet woodland**.
- 8.6 There are four large, shallow ponds and several smaller ones, most of which were dry at the time of the survey (following a summer with low rainfall). The shallower ponds have marginal stands of mire vegetation (mostly M1 Cow-horn bog moss pool *Sphagnum auriculatum* bog pool community and M4 Bottle sedge pool fen *Carex rostrata*-*Sphagnum recurvum* mire) **f2a8 Transition mires and quaking bogs; lowland**.
- 8.7 There are also stands of short acid grassland (U4 Bent-fescue pasture *Festuca ovina*-*Agrostis capillaris*-*Galium saxatile* grassland) which fall within **g1a6 Other lowland dry acid grassland**. This is found along lightly used paths,

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<sup>8</sup> The UKHab correspondence table suggests that H9e can fall within h1b6 Wet heathland with cross-leaved heath; upland, but clearly it is lowland heathland at Strensall.

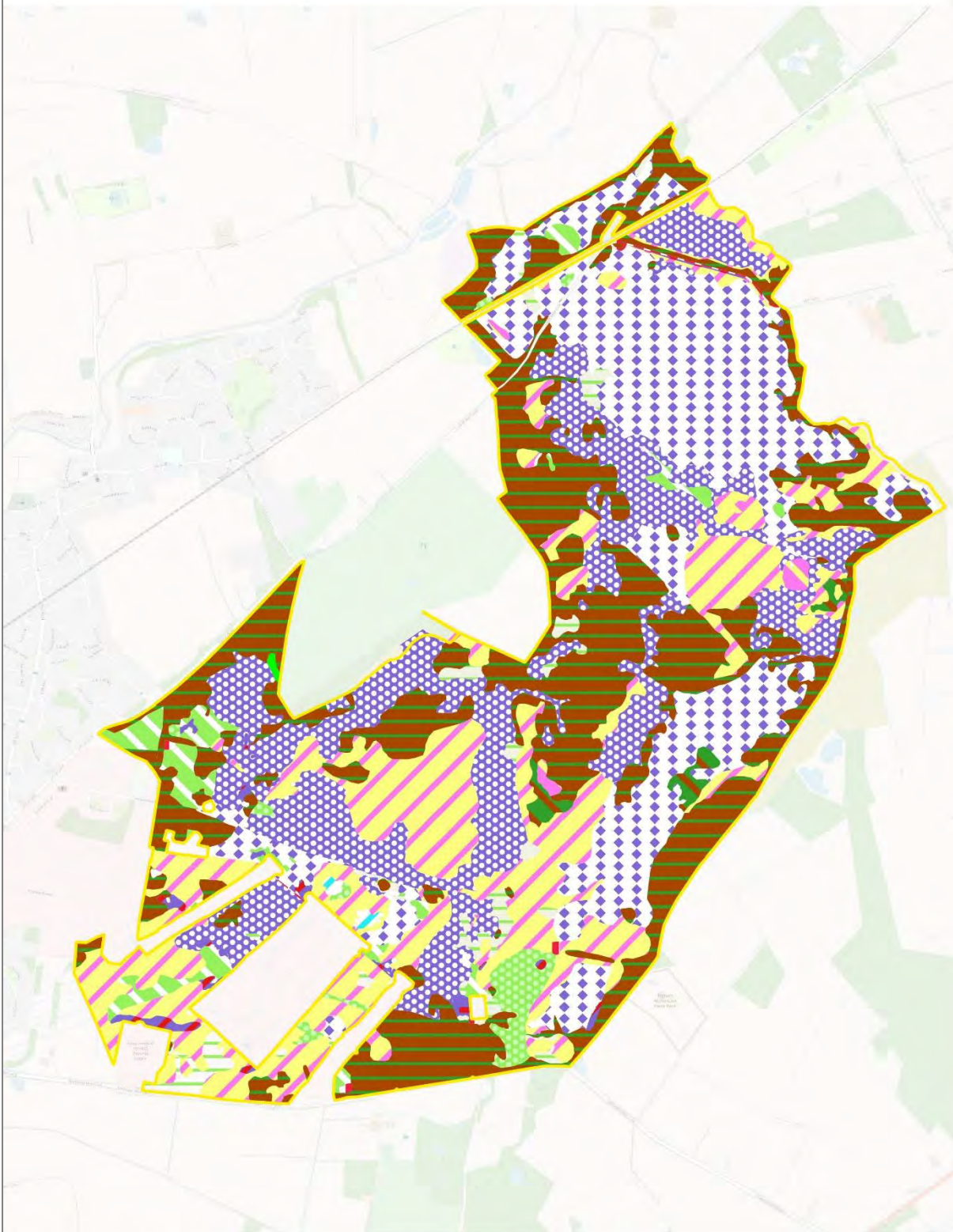
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around the base of trees where livestock gather and is also widespread in the mostly heavily grazed areas around the Scott-Moncrieff car park.

- 8.8 To the south, there are substantial areas of partially agriculturally improved vegetation with large drainage ditches. Here the vegetation is a mixture of M23 Sharp-flowered Rush-pasture - *Juncus acutiflorus-Galium palustre* rush-pasture, MG10 Soft rush-pasture - *Holcus lanatus-Juncus effusus* rush-pasture. Within in this context, these fall within the UKHab category **g3c8 Holcus-Juncus neutral grassland**.
- 8.9 There are also dense stands of Bracken and of European Gorse scattered throughout the site – this fall within UKHab **g1c Bracken** and **h3e Gorse scrub**.

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Map 12: Strensall Common habitat map



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Legend	
habitats	
	g1a - lowland dry acid grassland
	g1c - bracken
	g3c8 - Holcus-Juncus neutral grassland
	g4 - modified grassland
	w1d - wet woodland
	w1f7 - lowland mixed deciduous woodland
	h1a5 - dry heaths, lowland (H4030)
	h1a7 - wet heathland with cross-leaved heath, lowland (H4010)
	h3a6 - blackthorn scrub
	h3e - dense gorse scrub
	f2b - purple moor-grass rush pasture
	f2a - transition mire
	u1b - developed land. sealed surface
	r1 - standing open water

- 8.10 GIS shape files containing both UKHab and NVC codes for habitat polygons are provided with this report.
- 8.11 Plants of note recorded included Narrow Buckler-fern (restricted to wet woodland), Petty Whin *Gensita anglica* in wet heath at the northern end of the site at SE65729 614401 and SE65794 614446, Pillwort *Pilularia globulifera* in a shallow pond at SE65015942 and Cranberry *Vaccinium oxycoccos* at SE65200, 59517.



## 9. Impacts of recreation at Strensall Common SAC

9.1 In this section we draw on existing literature reviews and information gained from site visits to consider the impacts of recreation on the European site interest. It is important to highlight that the focus is on recreation impacts, rather than general pressures of increasing urbanisation (which includes issues such as increased cat predation, fragmentation, air quality etc.).

### Potential impacts of recreation

9.2 Natural England's Site Improvement Plan<sup>9</sup> for Strensall Common SAC priorities public access/disturbance as the most important current pressure or threat to the site.

9.3 Drawing on various national reviews of the nature conservation impacts of recreation access to particular habitats and species (Underhill-Day 2005; Lowen *et al.* 2008; Liley *et al.* 2010) and the HRA for the City of York Local Plan we identify that access to the SAC has the potential for the following impacts to the SAC:

- Trampling, leading to vegetation wear, soil compaction, erosion
- Increased fire incidence
- Disturbance to grazing livestock, resulting in grazing animals avoiding areas of the Common and potential difficulties in achieving the right levels and types of grazing
- Nutrient enrichment from dog fouling
- Contamination of ponds
- Contamination from fly tipping, litter etc.
- Damage to infrastructure (gates etc.), whether through wear and tear or direct damage from vandalism

9.4 These are considered in more detail below, drawing on relevant studies and material for background/context and from site visits to consider the current issues at Strensall Common SAC. We have not included disturbance to birds here because the bird interest is not reflected in the SAC designation. However, species such as Nightjar, Curlew and Woodlark which occur on the

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<sup>9</sup> Plan available on the [Natural England website](#)

site are ground nesting species and are vulnerable to human disturbance (e.g. Murison 2002; Mallord *et al.* 2007).

## Trampling, leading to vegetation wear, soil compaction, erosion

### Overview of issues

- 9.5 Recreational activities can lead to changes in soil characteristics and ultimately lead to erosion. Although erosion brought about by recreational activities is small compared to natural factors it can none the less an important form of soil degradation (Holden *et al.* 2007). Changes to substrates can in turn lead to changes in the ecological communities they support.
- 9.6 At lower levels of use, the main impact is on vegetation and is largely mechanical (Bayfield & Aitken 1992; Liddle 1997) while higher levels of use will also affect substrates. Light use may cause a slight decrease in vegetation cover, and a decline in the incidence of flowering. Bare ground may be colonised by trampling resistant species. Heavier ground pressure leads to greater losses of vegetation. Significant erosion can be expected where the plant cover falls below 70% (Liddle, 1997), but erosion can commence before this level is reached (Kuss & Morgan 1984). As loss of vegetation takes place, there is disruption and progressive loss of soil horizons by direct physical abrasion or loosening and indirectly by water and wind erosion. Important changes in soil structure and chemistry can result from compaction. Poor permeability to water can increase surface run-off, and reduced aeration can result in anaerobic conditions and poor root growth.
- 9.7 Trampling has been shown to alter the amount of litter present (Bayfield & Brookes 1979), soil water content, soil temperature and chemistry (Liddle 1997)
- 9.8 Different recreational activities can have a significantly different impact. In general, walking is likely to be less damaging than horse riding, cycling or motorised vehicles. For example, Weaver and Dale (1978) showed that horses were substantially more damaging, and motor cycles slightly more damaging than hikers in grassland and woodland in the US Pacific Northwest. Thurston and Reader (2001) suggest that mountain bikes cause the same amount of damage as hikers in deciduous woodland, although

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MacIntyre (1991) and Rees (1990) show that mountain bikes may cause slightly more damage than foot traffic depending on the type of habitat.

- 9.9 Heather-dominated vegetation is very susceptible to trampling damage, though there may be some differences related to individual species response and soil conditions. In summer and winter trials on undamaged lowland heathland in England (Harrison 1981), it was shown that 400 passes in the first summer of the experiment, caused heather cover to fall to about 50%, and by 800 passes it was less than 10%. The vegetation failed to recover in the period following the experimental trampling, after winter only, summer only, or all season trampling.
- 9.10 Seasonal and habitat response was tested in trials on heathland in Brittany (Gallet & Roze 2001) and though there were some differences, in all cases trampling led to a great decrease in vegetation cover, with the vegetation cover varying between 0 and 50% under 750 passes. Dry heathland was more resistant than mesophilous (humid) heath and significantly so with winter trampling, but both heath types were equally vulnerable in wet conditions. Gorse was more resilient than heathers; and younger dwarf shrubs were less vulnerable than older plants.
- 9.11 Heather is also more susceptible to trampling damage than purple moor-grass (Lake, Bullock & Hartley, S. 2001). In Belgium, Roovers *et al.* (2004) found that dry heath with a high proportion of grasses – Purple Moor-Grass and Wavy Hair-Grass - as well as dwarf shrubs, was less sensitive to trampling.
- 9.12 Though trampling can damage the dwarf shrub community of heathland, there are some aspects of the habitat that need the canopy to be broken, even to the extent of bare ground being sustained. Bare ground and early successional habitats are a very important component of the heathland ecosystem, important for a suite of plants, invertebrates and reptiles (Byfield & Pearman 1996; Lake & Underhill-Day 1999; Key 2000). Typically small, low-growing herbs with low competitive capacity require these open conditions and lack of suppression by a taller canopy. Some may be ruderals or annuals that can only survive in such conditions. Some kind of physical disturbance is usually required to create these bare ground habitats, and hence a certain level of physical disturbance, including erosion resulting from trampling, can be beneficial. However, the level of disturbance required is difficult to define and is likely to vary between sites (Lake, Bullock & Hartley 2001). There are likely to be optimum levels of use that maintain the bare ground habitats but

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do not continually disturb the substrate. Such levels of use have never been quantified, nor is it known whether sporadic use is likely to be better at maintaining bare ground habitats than low level, continuous use.

*Site specific evidence*

- 9.13 Excluding surfaced tracks and boardwalks, most paths at Strensall Common have been created by, and are maintained by, trampling pressure (although some of the tracks appear to be mown). This generally results in a short grassy sward, often dominated by fine grasses and rosette-forming herbs. In some places, particularly on wetter ground and under tree canopies the paths are bare and peaty/muddy. This is not considered to impact on the overall integrity of the site.
- 9.14 There are a small number of sandy tracks that provide bare ground habitat in an otherwise largely closed sward. This microhabitat is essential for many heathland invertebrates. Although probably created by vehicles, a moderate amount of trampling on these tracks may help maintain them as open habitat.
- 9.15 There is also some problems with unauthorised access by motor bikes. This has been a problem in the past and the MOD have put in barriers at the northern part of the site to attempt to limit unauthorised access. Motorbikes may cause particular wear and damage. Mountain bikes were also observed on site during the survey.
- 9.16 Away from paths and tracks, the nature of the terrain is likely to influence access patterns. In general, the tussocky Purple Moor-grass communities appeared to be less penetrable than drier, Heather-dominated areas, particularly where there was also young tree growth. Although Heather-dominated communities are potentially more vulnerable to trampling (see above) in addition to attracting more footfall, no significant impacts were observed away from paths.
- 9.17 Overall, wetter areas are less likely to be attractive to visitors because the walking conditions are more difficult (although ponds may be an attraction). This is clear in the northern and south western sections of the site, where there are very few paths crossing the main stands of vegetation. The section between the railway and York Lane also appears to be very little used. The limitations to access within the live firing range also mean that this area is presumably less used than that around the car parks (a substantial fence

was being erected along the live firing boundary at the time of the survey) and informal paths were much less frequent within this area.

## Increased fire incidence

### *Overview of issues*

- 9.18 Fires can be caused accidentally from discarded cigarettes, by sparks from a campfire, BBQs or from burning a dumped or stolen car, from fireworks, as a result of a controlled fire getting out of control, from discarded bottles in strong sunlight, from children playing with matches or similar, and from deliberate arson.
- 9.19 Based on 217 questionnaires from a sample of lowland heaths in Dorset, Kirby and Tantram (Tantram, Boobyer & Kirby 1999) found that 61% of fires were caused by arson, 8% from management fires getting out of control, 7% from bonfires and the remainder from camp fires, burning refuse, vehicle fires, property fire and sparks from a railway. The only natural cause of fire was from lightning. The same study noted that there was a widespread belief among the public and nature conservation professionals that most fires were deliberate and that children were often believed to be responsible (this would be most relevant on sites close to residential areas rather than remote uplands).
- 9.20 A number of studies have linked the incidence of fires with areas used by the public, or with the extent of urbanisation. In the Peak District National Park during 1970-1995, 84% of 324 recorded fires were next to roads, paths or within areas of open access, and many burnt areas on Exmoor are close to public roads (Miller & Miles 1984). Kirby and Tantram (1999) noted that of the 26 lowland heathland SSSIs in Dorset with the highest number of fires, 1990-1998, 70% were located in or adjacent to urban areas, including the top nine.
- 9.21 Fires can have major impacts on the soil, vegetation and fauna present, and recovery can take many years.
- 9.22 After a fire where temperature and intensity moderate, vegetation recovery will be largely influenced by the vegetation composition before the fire, although subsequent management, particularly grazing and trampling, will influence regeneration. The less palatable or better-adapted species may be favoured by grazing, so that, for example, cross leaved-heath and the more unpalatable graminoids may benefit initially at the expense of heather. On

wet heath, fire led to dominance by a range of graminoids that were not supplanted by dwarf shrubs for about 15 years (Currall 1981) and on a blanket bog in the Pennines, fire led to replacement of heather by Common Cotton Grass for at least 15 years (Rawes & Hobbs 1979). Stevenson *et al.* (1996) found that two serially burnt stands of dry heath aged more than 19 years when burnt had lower species richness than unburnt controls.

- 9.23 A range of studies show impacts of fires for invertebrate populations. Recovery of the full community of unburnt areas can take as little as two years in grassland to 20 years in heathland habitats (Bell, Wheeler & Cullen 2001; Panzer 2002). While some species and communities can benefit from the open conditions following a fire or in regularly burned sites, others can be seriously depleted or even eliminated (Kirby 2001).
- 9.24 Where fires are extensive, whole populations of invertebrates can be destroyed and large fires may cause local extinctions in less mobile species. Invertebrate groups which are most vulnerable to fire in open habitats are those present in the litter as eggs or larvae in spring when many fires take place, species with only one generation per annum and sedentary or flightless species or groups. These include molluscs, leafhoppers, grasshoppers and some butterfly and moth species (Kerney 1999; Panzer 2002). Fire can also be particularly damaging to reptile.
- 9.25 Controlled burning is sometimes used as a management tool to remove a build up of Purple Moor-grass litter and stimulate the growth of young heather, creating a more structurally diverse sward. However, this must be carried out in a narrow window of opportunity in late winter when there is least likely to be damage to heathland species. This is very different from wildlife, which is uncontrolled and often occurs in the summer when the damage to both flora and fauna is likely to be greatest.

### *Site specific evidence*

- 9.26 The distribution of the Dark Bordered Beauty Moth has become increasingly focussed on a number of small 'hotspots' within Strensall Common, whereas in the past it has been widely distributed across the site (Baker *et al.* 2016). This means it is potentially very vulnerable to fire, for example a fire in 2009/10 was particularly damaging (Baker *et al.* 2016).
- 9.27 Evidence of previous fire was noted in the northern central section of the site in an area where the sward was very even-aged.



## Disturbance to grazing livestock, resulting in grazing animals avoiding areas of the Common and potential difficulties in achieving the right levels and types of grazing

### *Overview of issues*

9.28 Public access and grazing can be difficult to reconcile. Grazing is essential to the conservation management of Strensall Common. Natural England's Site Improvement Plan highlights that if the site was unable to be grazed then the wet and dry heath communities would be adversely affected. The Site Improvement Plan identifies that access currently affects the ability of the site to be managed with the tenant farmer losing stock each year to dog attacks. It would therefore be expected that access will influence the choice of livestock and the grazing that can be achieved. The presence of people is likely to influence the overall distribution of livestock and which areas animals use.

### *Site specific evidence*

9.29 Strensall Common is currently grazed by both sheep and cattle. Cattle appear to be restricted to the centre of the site within the live firing zone. Sheep are more widely dispersed.

9.30 Almost all lowland heathland in the UK is semi-natural, i.e. has evolved through the interaction between natural processes and human behaviour. Without ongoing intervention, it will develop into secondary woodland with the loss of characteristic heathland species. Livestock grazing is one of the land-uses that helped create heathland and, combined with other management techniques, is key to maintaining heathland swards that are varied in structure and species (e.g. Lake, Bullock & Hartley, 2001). Grazing is therefore an essential part to the ongoing management of Strensall Common. The condition of the vegetation suggests that the current grazing plan could be beneficially tweaked for example to increase cattle grazing in some heavily Purple Moor-grass dominated areas, and possible reduce (but not remove) the sheep grazing pressure in others.

9.31 However, it is essential to achieve an appropriate balance as different species have different requirements. Grazing intensity has been raised as an issue for the Dark-bordered Beauty at Strensall Common. The site is the last remaining location for this moth in England and recent declines at Strensall

Common have been linked to grazing levels being too high (Baker *et al.* 2016). Access levels may affect the potential to get the long-term grazing management at the right stocking density.

- 9.32 The tenant farmer has issues with dog worrying of stock in most years and the numbers of visitors and uncontrolled dogs have caused problems for stock management. The tenant farmer has also lost stock on the Common and in one instance had stock butchered on site. Increased levels of recreational pressure will exacerbate this problem.

## Nutrient enrichment from dog fouling

### Overview of issues

- 9.33 A number of reviews have addressed the impacts of dog fouling (Bull 1998; Taylor *et al.* 2005; Groome, Denton & Smith 2018). Dogs will typically defecate within 10 minutes of a walk starting, and as a consequence most (but not all) deposition tends to occur within 400m of a site entrance (Taylor *et al.*, 2005). In addition, most faeces are deposited close to the path, with a peak at approximately 1m from the path edge (Shaw, Lankey & Hollingham 1995). Similarly, dogs will typically urinate at the start of a walk, but they will also urinate at frequent intervals during the walk too. The total volume deposited on sites may be surprisingly large. At Burnham Beeches NNR over one year, Barnard (2003) estimated the total amounts of urine as 30,000 litres and 60 tonnes of faeces from dogs.
- 9.34 Nutrient levels in soil (particularly nitrogen and phosphorous) are important factors determining plant species composition on heathland, the typical effect will be equivalent to applying a high level of fertilizer, resulting in a reduction in species richness and the presence of species typically associated with more improved habitats. The impacts of dog fouling can often be seen in the form of grassy wedges/edges of paths on many heaths with high levels of access. This can be exacerbated by trampling, which has a lesser effect on species such as grasses (which grow from the base rather than the tip).
- 9.35 One study on chalk grassland, a typically nutrient poor habitat, showed that in the first 50m alongside the path the typical chalk grassland flora was replaced by crested dog's-tail and perennial ryegrass (Streeter, 1971). It also showed that although this change in flora did not correlate well with available soil nitrogen, it did correlate with soil phosphate, hypothesised to

come from dog faeces. In another study on a heathland site frequently used by dog walkers, available soil nitrogen and phosphate followed the spatial distribution as dog faeces which peaked at 1m from the path and showed a conversion from a heathy to grassy sward (Shaw et al., 1995).

- 9.36 Very little is known about the nutrient composition of dog urine and its impacts on habitats. It is however known that dog urine can scald vegetation and does provide some enrichment of soil nitrogen (Taylor et al., 2005). It is also known that urine does more damage on dry soils because the salts cannot disperse as easily.
- 9.37 The persistence of dog faeces and nutrients in the soil will be subject to a number of factors, but primarily the soil type, soil water, weather and temperature. Dog faeces can take up to two months to break down, however if the weather is cold and dry this is likely to take longer, whereas if it is warm and wet it is likely to take less time (Taylor et al., 2005). The persistence of these nutrients in the soil is strongly influenced by the soil type. In one study it was calculated that phosphorous derived from agricultural fertilisers persist between 15 and 20 years in sandy soils, while it was not uncommon for them to persist for 30 years or more in heavy clay soils (Gough & Marrs 1990).

### *Site specific evidence*

- 9.38 At Strensall Common eutrophied vegetation is evident in close proximity to Galtres car-park and the Scott Moncrieff car-park and some laybys. It is often characterised by tall swards containing nettles. Along some of the more heavily used paths in the vicinity of the car parks the vegetation at the side of the path also shows evidence of eutrophication, with Perennial Rye-grass rather than heath species present. This vegetation is likely to be linked to a dog walking culture in which picking up dog faeces is not prevalent.

## **Contamination of ponds**

### *Overview of issues*

- 9.39 Ponds and small water bodies are often popular with dogs and dog walkers will often seek such features out, particularly in hot weather. Heavy use by dogs leads to turbid water, an impoverished invertebrate flora and a loss of vegetation (Denton & Groome 2017; Groome, Denton & Smith 2018). These impacts are linked to the trampling/splashing of the dogs and are potentially exacerbated contamination from wormer, tick and flea treatments (Groome,

Denton & Smith 2018). Dogs may also act as vectors for non-native invasive plant species, such as New Zealand Pygmyweed (Groome, Denton & Smith 2018).

### *Site specific evidence*

- 9.40 Most ponds and small water bodies encountered were dried out at the time of the UKHab survey and it was difficult to establish the extent of any existing recreational impact. Many are surrounded by unstable wetland vegetation which is unlikely to be attractive to dog walkers. The Strensall ponds are known for Marsh Stitchwort, Mud Snail, Pillwort, Common Toad and Great Crested Newt. Of these, Pillwort can be considered characteristic of one of the designated Annex I habitat types, as it is typically found on the drawn-down zone of ponds in wet heath. Pillwort requires open conditions and therefore some trampling at the edges of ponds can help maintain suitable conditions (although this is a function usually fulfilled by livestock). However, ponds can be attractive to dogs and excessive use would lead to the loss of vegetation including Pillwort. The pond at SE6501 5942 currently has an extensive Pillwort population. Although dry at the time of the survey, it is very close the track which provides a main route N-S through the southern area of the site, and is potentially vulnerable.

## **Contamination from fly tipping, litter etc.**

### *Overview of issues*

- 9.41 Litter is a ubiquitous problem and can range from large volumes of roadside fly tipping to a small number of discarded food wrappings. It can occur anywhere, regardless of habitat, although generally more prevalent in areas with greater public access. The impacts are perhaps predominantly aesthetic, and litter and dumping of rubbish are rarely explicitly identified as a nature conservation issue. However, there are causes for concern for some habitats such as heathlands (Underhill-Day, 2005).
- 9.42 Plastic debris is an environmentally persistent and complex contaminant of increasing concern and while most of the focus has been on the marine environment, increasing concern is being raised about plastic in terrestrial environments and there are clearly gaps in our understanding (Horton *et al.* 2017).

*Site specific evidence*

- 9.43 Fly tipping was not noted as a significant problem at the time of the survey although some was evident. Some litter was also present. This was usually limited to the vicinity of car parks (e.g. piles of beer cans), but was also noted at other places (for example beer bottles on the edge of the Kidney Pond at SE 6505 5972).

**Damage to infrastructure (gates etc.), whether through wear and tear or direct damage from vandalism***Overview of issues*

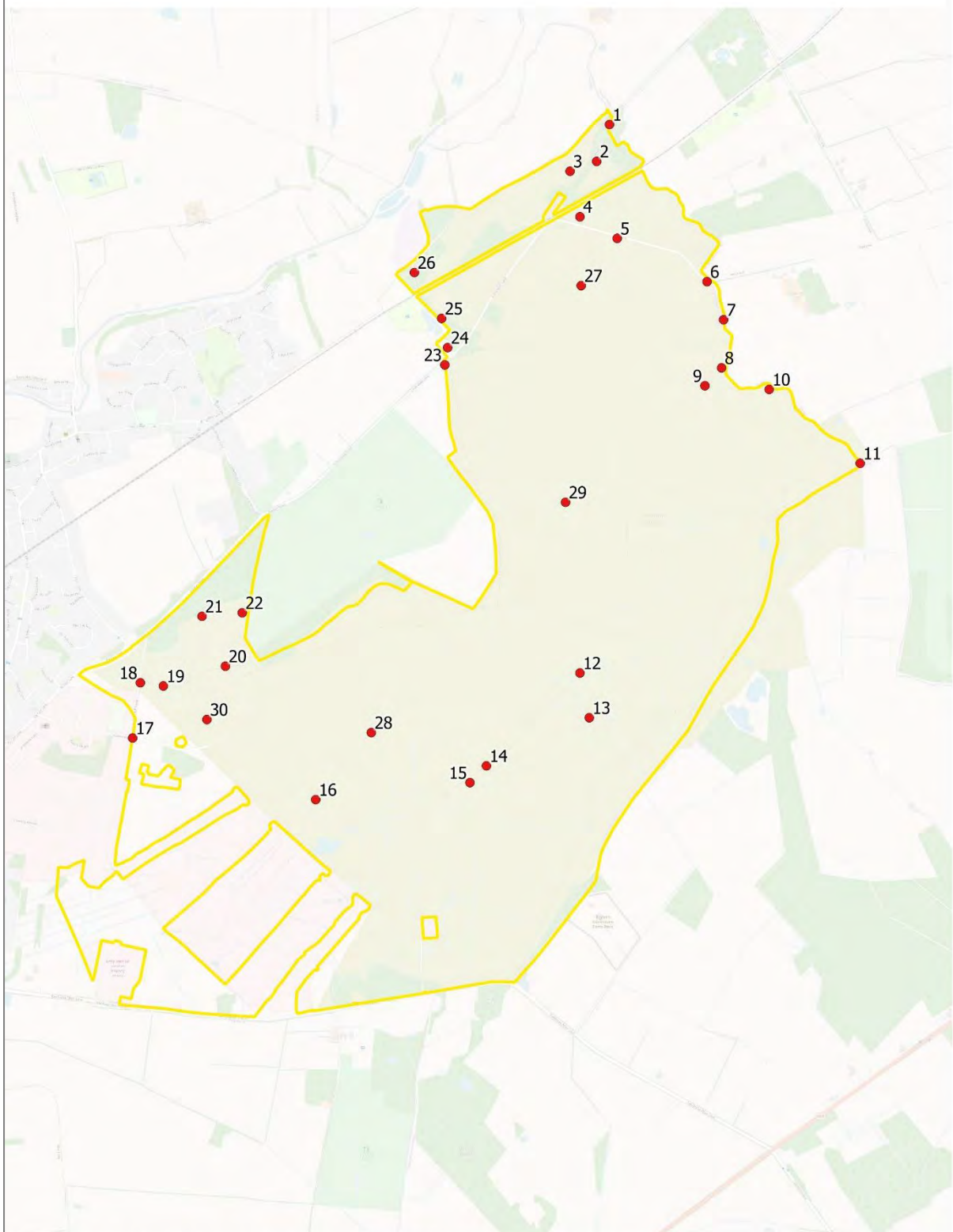
- 9.44 Damage to infrastructure can occur in a variety of ways. With more footfall, infrastructure such as car-parks, paths, gates and stiles are likely to need more maintenance and repair. Direct damage can also occur through vandalism.
- 9.45 While not fundamental to the SAC interest, where infrastructure becomes in a poor state or does not appear looked after, it may influence visitors' perceptions of the site, for example suggesting that there is no provision in place to prevent anti-social behaviour. Replacing or repairing infrastructure is likely to take staff time and resources, and this may limit the available funds for habitat management or other site work more relevant to the SAC interest.

*Site specific evidence*

- 9.46 At Strensall Common, there was evidence of graffiti and damage to signs/interpretation and also sprayed graffiti on the trees around the Scott Moncrieff and the Galtres car-parks. While limited in extent currently, there is potential for these issues to escalate. Although it has no direct impact on the SAC interest features of the site, it is both indicative of visitors' attitudes towards the site and may also influence behaviour (see above).

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Map 13: Target notes relating to recreational pressure at Strensall Common



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**Table 21: Target notes relating to recreation pressure recording during habitat survey (September 2018).**

Point	Target note
1	Moderately well-used path through woods
2	Stile grown over
3	Lightly-used path across heath towards dwellings
4	lightly-used path runs parallel to road inside tree line and thick gorse "hedge"
5	obvious recent litter in lay-by
6	Well-used access points with paths in 3 directions onto heath
7	Dog poo bag hung on fence
8	Fresh cycle and horse tracks, some poaching
9	Path along drier ground of drain bank
10	Broad path along boundary drain, but little bare ground
11	Access point with "private" sign leading onto maintained path
12	Boardwalk "bridges" on main N-S track
13	Kissing gate into grazing enclosure with limited signs of use
14	main N-S vehicle track is grassy, suggesting limited pedestrian use
15	Shallow-sided pond with Pillwort - potentially vulnerable to dogs due to proximity to track
16	Small area of tightly grazed grassland with old Purple Moor-grass tussocks - shows how grazing can increase the ease with which visitors can penetrate an area by decreasing the tussockiness of vegetation
17	Current entrance point from Strensall Camp on tarmac road
18	Public car-park. Some graffiti on back of interpretation boards and some patches of nettles around car-park
19	3 mountain bikes past while visiting, with 2 dogs (off lead).
20	Green, nutrient-enriched edges with nettles on margin of well-used track
21	Unusually frequent paths (doubled up)
22	Gravelled path and encroachment on SAC from golf course
23	Main car-park. Dense nettles around edge. Graffiti on dog bins and on oaks.
24	Desire line from car-park across towards track and railway crossing
25	Fly-tipping - old shed, also cans and other litter, indicating parking and recreational use
26	Kissing gate - appears lightly used
27	Very few paths crossing tussocky vegetation and wet terrain in northern section
28	Access appears to be very limited in this area
29	A network of paths in this area
30	A network of paths in this area

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Little used access point in YWT area (TN1).



Well-used path through woods and more lightly used path through grazing unit in YWT area (TN2, 3).



Lightly-used path parallel with road in northern section of common (TN4).



Broad path along main boundary drain on eastern edge of site appears well used but with little bare ground (TN10).



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<p>Occasional marker posts are found on colour-coded routes throughout site.</p>	<p>Littering is mainly concentrated around car parks and laybys (TN2).</p>	<p>Heavy grazing (e.g. in areas where livestock congregate) can create short swards that are more easily accessible by visitors (TN16).</p>	<p>Path surfacing can lead to changes in adjacent vegetation, as seen here (TN22).</p>
			
<p>Much of the vegetation is bulky and visitors are unlikely to penetrate far off the paths (track along SE boundary).</p>	<p>Kissing gate into grazing enclosure near centre of site with only limited signs of use (TN13)</p>	<p>Abundant aquatic vegetation and intact bankside vegetation suggest this pond is largely undisturbed by dogs.</p>	

## 10. Discussion and Implications

- 10.1 The visitor survey results indicate that the site is well used and popular with local residents who visit for a range of activities, predominantly dog walking, walking, jogging and cycling.
- 10.2 There are a range of ways access can impact the nature conservation interest, but at present impacts would appear to be limited to:
- Issues with grazing, including incidents of sheep worrying and potential challenges in achieving the right long-term grazing regime;
  - A risk of fire;
  - Some dog fouling;
  - Some graffiti and vandalism around the car-parks;
  - Some littering and fly-tipping including evidence of antisocial behaviour.
- 10.3 It is clear from the comments from interviewees that many view the site as special and have a strong affinity to it. It is also clear that there are pressures/demands from visitors, for example views of interviewees reflected an interest in seeing café facilities, changes to the grazing, management of muddy paths etc.
- 10.4 Our predictions suggest an increase in access of 24% as a result of the quantum of proposed housing in the City of York Local Plan. This is a marked change and given the scale of change, the issues we have outlined above will be exacerbated and there will be growing pressures on the management of the site.
- 10.5 Given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity. Potential approaches to mitigation are considered below.

### Potential approaches to mitigation

- 10.6 Diverting visitors away from the SAC by providing alternative greenspace is one mitigation option. Suitable Alternative Natural Greenspace (SANGs) are

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a key component of mitigation approaches around other heathlands, such as Dorset and the Thames Basin Heaths. In these areas SANGs are considered as suitable mitigation only for developments set back from the European site boundary (beyond 400m).

- 10.7 The visitor survey results indicate that visitors to Strensall Common undertake relatively long routes, with a median route length of 2.5km when clipped to the SAC boundary. Significant areas of green space would be necessary to accommodate routes of this length. The rural/wild landscape was a key factor determining interviewee's choice of site, again suggesting that any alternative green space provision would have to be significant and have a semi-natural feel.
- 10.8 Close to home was also a key factor in visitor's choice of site and Figure 13 clearly shows current residents living within 500m visit particularly frequently compared to those further away. As such there is likely to be a disproportionate effect of housing in close proximity to the SAC and such housing will be potentially harder to mitigate as it will be very hard to deflect visitors away from Strensall Common. As such the role for any alternative greenspace provision would probably need to be targeted towards those people coming from further afield and there may be limited opportunities to deflect access from development within a few hundred metres of the SAC. For new development that is set well back from the SAC, such that the main means of access is by car, provision of suitable alternative natural greenspace of a suitable size and quality could work to absorb access, particularly if the new greenspace was targeted towards dog walkers.
- 10.9 Development directly adjacent to the SAC boundary or in close proximity therefore poses particular challenges, and it should be noted that at other heathland areas, such as the Dorset Heaths, Thames Basin Heaths and East Devon Heaths there is a presumption against development within 400m.
- 10.10 For development in Strensall, and particularly H59 and SS19/ST35, it will be important to ensure access to the SAC is through the main access points, ensuring visitors walk or drive through the village rather than providing diffuse direct access onto the SAC boundary. This will require robust barriers to limit direct access and there is likely to be – in the long-term – demand for residents to be able to have direct access. Ensuring a robust, permanent barrier will be a challenge and there are various examples from other heathland sites where a fence has not been deemed effective

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mitigation. For example, at Talbot Heath in Dorset a planning appeal<sup>10</sup> for 378 housing units, student accommodation and academic floor space adjacent to a heathland SAC/SPA was refused by the Secretary of State. While the Inspector concluded that, if a fence could be implemented in its entirety and properly maintained, it would effectively increase the distance that new residents would need to travel to access the Heath she also raised doubts as to the feasibility of implementing a fence for the whole of the proposed length. At Strensall, given the MOD ownership and presence of existing security fencing it may be possible to provide the necessary barriers and have confidence in them being maintained in-perpetuity. High-specification security fencing will not feel so out of place and is more likely to be accepted by residents. Were the site not to remain in MOD management or control then there could be doubts about the potential for fencing effective.

- 10.11 Elsewhere, for example along York Lane, a fairly impenetrable hedge of gorse impedes direct access to the heath – these hedges could be maintained to discourage casual access along the road, however there is likely to be pressure for access onto the nearby Common should housing levels around the boundary increase.
- 10.12 Assuming that it might be possible that access is effectively pushed towards the main car-parks and entry points, then a number of measures could then potentially be implemented that will help absorb the additional recreation pressure and help to resolve the current issues identified above.
- 10.13 Wardening is a component of mitigation approaches at other sites such as Dorset and the Thames Basin Heaths. Wardens or Rangers can provide a presence on site, able to directly talk to visitors and deal with any problems. At Strensall Common such a role could involve:
- Facilitating the grazing management through liaison with visitors, highlighting where grazing animals are and acting as a ‘looker’;
  - Deterring anti-social behaviour such as motorbikes around the car-parks, fire, graffiti etc;
  - Dealing with any issues, such as gates left open, bins needing emptying, damage to infrastructure and on-hand to direct the emergency services in the case of a fire;

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<sup>10</sup> Application by talbot village trust (tvt) application ref: 00/08824/084/P land south of Wallisdown Road, Poole, Dorset



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- Talking to visitors to make them aware of the conservation interest and any particular issues (e.g. fire risks, training, livestock presence);
- Directly influencing the behaviour of any visitors likely to cause problems, for example dogs off leads around livestock;
- Positively engaging with the local community through attending events, hosting guided walks, encouraging wildlife recording and volunteer involvement etc.

- 10.14 Ensuring the site is effectively grazed in the long-term will be key, and the wardening will be a positive step towards ensuring any conflicts with access and grazing in the long term are minimised or avoided. An additional approach to consider, that is used elsewhere (e.g. Braunton Burrows in Devon), is the provision of a website (for example a Facebook page) with information about which units are grazed at any one time, so that visitors can choose to avoid stock.
- 10.15 A further measure that is likely to improve the robustness of the site is reducing the amount of drainage, with the potential to restore the site so that it is much wetter. This is likely to be beneficial to the SAC habitats and will reduce the risk of fire. Decreasing drainage would help revert wet heath, mire and transitional vegetation communities towards wetter forms that would once have characterised Strensall Common. It would not affect the dry heath habitat that is on raised ridges (see section 8.3 for a discussion of the classification of wet and dry heath on Strensall Common).
- 10.16 Decreasing drainage is likely to be unpopular with some visitors. The visitor surveys were undertaken during a very dry and hot summer. During the site visits many of the ponds on the site were dry and therefore the site was perhaps particularly accessible. The route data suggests some visitors were crossing the main wetland areas, and the banks of the drainage ditches towards the north-east of the site are likely to provide easy foot access even during wetter periods (such paths were noted during the survey). Were some blocking of ditches and re-wetting to be undertaken, access is likely to be pushed to the edges of the site. While this is likely to be unpopular with visitors, provision of a good walking route, with board walks through the wetter areas, could then focus access, shifting use away from a more diffuse use of the site to use more concentrated on set routes. This will make access easier to manage in the long-term and provide better opportunities to engage with visitors. In order to achieve this shift, wardens will play an important role, and signage and interpretation will also need to be updated.

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- 10.17 Signage and updated interpretation will play a role in directing visitors and helping explain the issues. Changes to the drainage and the provision of boardwalks and such infrastructure may deter cyclists and horse riders and it may be necessary to review these particular activities and provide some kind of dedicated routes for these activities. These would not necessarily need to be within the SAC.
- 10.18 Some of the particular nature conservation interest at Strensall Common is associated with ponds and some of the key ponds are directly adjacent to well-used paths. It is clear from the automated counter images that many of the dogs leaving the site are wet and muddy, suggesting that even during dry conditions they were finding water to splash in. In the key pools, low fencing and signage may be necessary to deter dogs from entering the water or limiting the areas that become turbid (see Denton & Groome 2017 for options).
- 10.19 The results set out here provide a snapshot of access to inform the plan-level HRA. While further visitor work, for example during the winter when the ground is wetter, may be useful; the data presented here provides a large sample and a clear picture of current access at Strensall Common. The types of access recorded, and the visitor data collected would suggest access is likely to be similar through the year, and as such at this point in time there is little merit in further data collection. A further key component of mitigation will however be regular monitoring and the methods used here provide a baseline against which visitor numbers and access patterns can be checked. Regular monitoring will be important to pick up any changes in access (for example visitors parking in different locations, different paths becoming more popular, different activities taking place, new entry points becoming established) and help direct the mitigation.
- 10.20 At plan-level HRA it will be necessary to have confidence that the above mitigation measures are feasible and achievable in order to rule out adverse effects on integrity on Strensall Common SAC as a result of increases in recreation. At subsequent project-level HRA it will be necessary for the details of the mitigation to be confirmed and in place ahead of any occupation of new housing.

## 11. References

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## Appendix 1: Questionnaire



Good morning/afternoon. I am conducting a visitor survey on behalf of City of York Council and Selby District Council, who are interested in gathering visitor's views about this site and how they use it. Can you spare me a few minutes please?

Q1 ...

- Are you on a day trip/short visit and have travelled directly from your home today... *if no*
- Are you on a short trip/short visit & staying away from home with friends or family ... *if no*
- Are you staying away from home, e.g. second home, mobile home or on holiday
- If none of the above, **How would you describe your visit today?**

Further details

Q2 **What is the main activity you are undertaking today? Tick closest answer. Do not prompt. Single response only.**

- Dog walking
- Walking
- Jogging / power walking / running
- Outing with family
- Cycling / Mountain Biking
- Bird / Wildlife watching
- Enjoying scenery / fresh air
- Photography
- Meeting up with friends
- Picnic
- Horse riding
- Other, please detail:

Further details



V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
S t r e n s a l l   C o m m o n

**Q3** Over the past year, roughly how often have you visited this site? Tick closest answer, single response only. Only prompt if interviewee struggles.

- Daily
- Most days (180+ visits)
- 1 to 3 times a week (40-180 visits)
- 2 to 3 times per month (15-40 visits)
- Once a month (6-15 visits)
- Less than once a month (2-5 visits)
- Don't know
- First visit
- Other, please detail

Further details:

**Q4** How long have you spent / will you spend at this site today? Single response only.

- Less than 30 minutes
- Between 30 minutes and 1 hour
- 1-2 hours
- 2-3 hours
- 3-4 hours
- 4 hours +

Further details

**Q5** Do you tend to visit this area at a certain time of day? Tick closest answers. Multiple answers ok.

- Early morning (before 7 am)
- Late morning (between 7 am and 10 am)
- Midday (between 10 am and 2 pm)
- Early afternoon (between 2 pm and 4 pm)
- Late afternoon (between 4 and 6 pm)
- Evening (after 6 pm)
- Varies / Don't know
- First visit

**Q6** Do you tend to visit this area more at a particular time of year for [insert given activity]? Multiple answers ok.

- Spring (Mar-May)
- Summer (Jun-Aug)
- Autumn (Sept-Nov)
- Winter (Dec-Feb)
- Equally all year
- Don't know
- First visit

**Q7** How long have you been visiting this site? Single response only. Do not prompt.

- Don't know
- First visit
- less than or approximately 6 months
- less than or approximately 1 year
- less than or approximately 3 years
- less than or approximately 5 years
- less than or approximately 10 years
- more than 10 years

Further details:

V i s i t o r s u r v e y s a n d i m p a c t s o f r e c r e a t i o n a t  
S t r e n s a l l C o m m o n

**Q8 How did you get here today? if necessary prompt with: What form of transport did you use? Single response only.**

- Car / van  
 On foot  
 Bus  
 Bicycle  
 Other, please detail

Further details:

**Now I'd like to ask you about your route today. looking at the area shown on this map, can you show me where you started your visit today, the finish point and your route please. Probe to ensure route is accurately documented. Use P to indicate where the visitor parked, E to indicate the start point and X to indicate the exit. Mark the route with a line; a solid line for the actual route and a dotted line for the expected or remaining route.**

**Q9 Is / was your route today the normal length when you visit here for [insert given activity]? Tick closest answer, do not prompt. Single response only.**

- Yes, normal  
 Much longer than normal  
 Much shorter than normal  
 Not sure / no typical visit  
 First visit

**Q10 Were you following a marked route or signposted route? Tick closest answer, do not prompt. Single response only.**

- No  
 Not sure/don't know  
 Yes

**Q11 If yes, what was the name or colour of the route you were following?**

**Q12 What, if anything, influenced your choice of route here today? Tick closest answers, do not prompt. Multiple responses ok.**

- Weather  
 Daylight  
 Time  
 Other users (avoiding crowds etc)  
 Group members (eg kids, less able)  
 Muddy tracks / paths  
 Followed a marked trail  
 Previous knowledge of area / experience  
 Activity undertaken (eg presence of dog)  
 Interpretation / leaflets / promotion  
 Viewpoint / Feature  
 Other, please detail

Further details:

Visitor surveys and impacts of recreation at  
Strensall Common

**Q13 Why did you choose to visit this specific location today, rather than another local site? Tick all responses given by visitor in the 'other' column. Do not prompt, tick closest answers. Then ask Which single reason would you say had the most influence over your choice of site to visit today? Tick only one main reason. Use text box for answers that cannot be categorised and for further information.**

	Other	Main
Don't know / others in party chose	<input type="radio"/>	<input type="radio"/>
Close to home	<input type="radio"/>	<input type="radio"/>
No need to use car	<input type="radio"/>	<input type="radio"/>
Quick & easy travel route	<input type="radio"/>	<input type="radio"/>
Good / easy parking	<input type="radio"/>	<input type="radio"/>
Particular facilities	<input type="radio"/>	<input type="radio"/>
Refreshments / cafe / pub	<input type="radio"/>	<input type="radio"/>
Choice of routes	<input type="radio"/>	<input type="radio"/>
Feels safe here	<input type="radio"/>	<input type="radio"/>
Quiet, with no traffic noise	<input type="radio"/>	<input type="radio"/>
Not many people	<input type="radio"/>	<input type="radio"/>
Scenery / variety of views	<input type="radio"/>	<input type="radio"/>
Rural feel / wild landscape	<input type="radio"/>	<input type="radio"/>
Particular wildlife interest (including trees)	<input type="radio"/>	<input type="radio"/>
Habit/familiarity	<input type="radio"/>	<input type="radio"/>
Good for dog / dog enjoys it	<input type="radio"/>	<input type="radio"/>
Ability to let dog off lead	<input type="radio"/>	<input type="radio"/>
Closest place to take dog	<input type="radio"/>	<input type="radio"/>
Closest place to let dog safely off lead	<input type="radio"/>	<input type="radio"/>
Appropriate place for activity	<input type="radio"/>	<input type="radio"/>
Suitability of area in given weather conditions	<input type="radio"/>	<input type="radio"/>
Presence of water	<input type="radio"/>	<input type="radio"/>
Other, please detail	<input type="radio"/>	<input type="radio"/>
Further details:		

V i s i t o r   s u r v e y s   a n d   i m p a c t s   o f   r e c r e a t i o n   a t  
S t r e n s a l l   C o m m o n

I would now like to ask about other local sites that you visit for [given activity].

**Q14** What proportion of your weekly visits for [given activity] take place at here compared to other sites. Can you give a rough percentage? *Do not prompt*

- All take place here  
 75% or more  
 50-74%  
 25-49%  
 less than 25%  
 Not sure/don't know/first visit

**Q15** Which one location would you have visited today if you could not visit here? *Do not prompt, tick closest answer.*

- Not sure/ Don't know  
 Nowhere/ wouldn't have visited anywhere  
 Site Named:

Record site name:

**Q16** Are there any changes you would like to see here with regards to how this area is managed for recreation and people? *Do not give options*

**Q17** Do you have any further comments or general feedback about your visit and access to this area?

**Q18** What is your full home postcode? *This is an important piece of information, please make every effort to record correctly.*

**Q19** *If visitor is unable or refuses to give postcode:* What is the name of the town or village where you live?

**Q20** *If visitor is on holiday ask:* Which town / village are you staying in?

That is the end. Thank you very much indeed for your time.

Visitor surveys and impacts of recreation at  
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## Q21 TO BE COMPLETED AFTER INTERVIEW FINISHED.

Surveyor initials	<input type="text"/>
Survey location code	<input type="text"/>
Map Reference Number	<input type="text"/>
Gender of respondent	<input type="text"/>
Total number in interviewed group	<input type="text"/>
Total males	<input type="text"/>
Total females	<input type="text"/>
Total minors (under 18)	<input type="text"/>
Total number of dogs	<input type="text"/>
Number of dogs seen off lead	<input type="text"/>

Q22 **Surveyor comments.** *Note anything that may be relevant to the survey, including any changes to the survey entry that are necessary, eg typos/mistakes/changes to answers/additional information.*



## Appendix 2: Responses to Q16, are there any changes you would like to see here with regards to how this area is managed for recreation and people?

All responses are listed below. These were typed as part of the interview and often it was necessary to paraphrase, as such the comments do not necessarily reflect the precise words stated by the interviewee.

Adders restricting dog walkers use of site
Appreciate the amount of dog bins and they are serviced
Asked whether lads with trail bikes still an issue
Avoid sheep
Avoid sheep
Avoid sheep means can't let dog off lead
Beautiful landscape, unspoilt
Benches would be nice; stop 4x4s.
Better signage
Boardwalks installation appreciated
Boggy in wet weather needs more hard core to fill holes
Bridges across streams
Brilliant keep it up
Control dogs. Adders
Control of dog mess
Controlled so less parking; people coming too far and not showing respect, enforcement of rules,
Cow muck and worries over bull and bullocks
Deal with muddy paths
Deal with muddy paths
Dog keeps eating sheep poo and it is making him ill. Has to keep dog on lead when sheep are around. Adders top concern for dog walkers - has noticed far fewer dog walkers because of the snakes. Fence off both sides of track? More poo bins onward toward Towthorpe.
Dog mess signs - human safety as a training site so really important poo is picked up. Adders put people off. Signs taken down when sheep on site.
Dog poo pick up needs to be enforced
Dog walkers need to clean up after their dogs and not leave poo in bags on site
Don't like fenced areas so more access
Don't like landmark aggressive driving mod contractors
Don't release adders
Drive through costa



Visitor surveys and impacts of recreation at  
Strensall Common

ESA agreement should relate to public recreation - it should come first. Concerned about cattle

Fine keep doing what you're doing. Clean and tidy

General maintenance of footpaths. Less muddy paths

Gravel whole section of path to reduce muddy bits. Gravelled a footpath but not completed

Ground nesting birds at risk. On army conservation group

Heavy traffic uses the path, with no space for walkers. Needs structure to road for pedestrians

lighting in car park? Sheep out of fenced areas

Improve Muddy paths

Keep as is

Keep as it

Keep sheep and path maintenance

Keep sheep off

Keep the undergrowth, nettles and ferns down around paths

Know where sheep are

Leave as is. Regarding coloured routes, used one the other night and got lost so needs updating

Leave well alone

Less fencing

Less litter farther on the walk

Less sheep

Litter and motorbikes

Litter control

Litter first thing in morning

Looked after well

Love the place, useful to have sign when sheep are going to be on and off

Maintain Heather and control birch

Maintenance of paths and bridges

Make sure gates are open when not firing

Management by sheep. Likes the open aspect of common

More access needed, so can do circular routes. The footbridge across the Foss is missing \_ needs putting back

More access to firing area

More bins and less sheep

More bins for waste

More bins lovely place

More dog bins

More enforcement of picking up dog poo

More poo bins

More signs

Must stay as sssi as so much wildlife. Must be protected. Urbanisation of strensall is having a detrimental effect. The common is a vital lung for the area.

Need a footpath along the main road so you can increase choice of circular walks, and safer

Need pick up dog poo

Visitor surveys and impacts of recreation at  
Strensall Common

New stile position indicated on map
No cattle or fenced
No cattle, too many sheep, tree felling
No complaints its lovely
No keep it
No more adders please
No overnight parking causing litter problems
No overnight parking, especially tourists
No restrictions on overnight camping
No sheep droppings
Path maintenance over wetter areas
Path running to Foss river, couldn't get through, overgrown.
Pick up dog mess
Plant equipment caused muddy areas. Gravel paths left uncompleted. Boggy areas
Please keep it just as it is
Poor bin in middle, access
Prior warning for sheep
Reduce sheep grazing, lot of dung
Remove fencing and other limitations tp keep it beautiful and open
Remove litter
Remove sheep or have area without them for dogs
Repair gates, get people to shut gates, pick up litter, unlock gates when shooting finishes
Restrict sheep so know where will be and firing access restrictions
Rutted paths in summer. What about mobility access
Shame that bridge was rememoved after fall by woman. Gates are padlock
Sheep an issue get on golf course
Sheep not looked after, find dead ones
Sheep notice to say if here as a few have been left
Sheep restricts access
Sheep serve a purpose but restricts dog off lead
Shocked at bagged dop poo being hung in trees
Should have red flag pole in each car park.relevant up to date sign re bull in field its old
Signposting on common is good. Litter pretty good. Very positive
Snakes are really a problem
Sorry to see gorse cut down as miss the birds
Sort muddy areas
Speed limit signs - lorries to sewage works going too fast. Reduce the undergrowth around trees to make it easier to walk through
Stay as is
Stop camping at this car park
Stop overnight stops
Think clearly how to manage as sssi. Mod digging huge ruts in tracks. Locals annoyed that bylaws are being ignored campervans
Tree stumps to sit on
Very pleasant shade good to have litter bins

Visitor surveys and impacts of recreation at  
Strensall Common

Very pleased. Rangers are nice

Very positive. Vital it is maintained. Worry after military gone a risk of poor management and supervision.

Very well managed

Want it to be protected for wildlife

Welcome new litter bins. In some places on path was overgrown but now cut back

Well run; dont commercialise

When sheep are on if they can be far side of the firing range fence overshoot. Bullocks lively

Wondered if army practising can I still walk my dog? Sheep and dogs being wary

Would like it left alone just tidy up

Would like restricted area to be smaller

Would like some benches

## Appendix 3: Responses to Q17, further comments or feedback?

All responses are listed below. These were typed as part of the interview and often it was necessary to paraphrase, as such the comments do not necessarily reflect the precise words stated by the interviewee.

A couple weeks ago person managing flock berated them for not shutting gate, so put off walking on site
Accept access restrictions
Any chance of taking the old fences down?
Avoids sheep
Can be busy
Come here for photography and art
Current favourite place
Dog poo off path
Dogs like to socialise
Don't change anything
Don't like the adders
Don't like the enclosures by fencing and gates.
Enjoy as is
Enjoy coming
Enjoy coming
Enjoy it
Excellent for artists
Fires and litter early in morning
Good
Good path maintenance
Good to know when and where sheep will be.
Great job
Happy
Happy
Happy as is
Highly valued by locals
Hooligans with cars and setting fires needs policing
Hope when military leave 2021 keep same
Important for locals to keep fit
Invaluable public resource
Keep it open and maintained
Keeping gorse down and other heathland management
Less people especially at weekends
Less tree felling

Visitor surveys and impacts of recreation at  
Strensall Common

Like as is
Like it as is
Like it as it is and good for family
Like wildness
Like woods
Likes free parking
Likes variety
Long term strategic approach to recreational use needed, problem with dogs going into ponds
Lovely
Lovely area
Lovely site except for snakes
Management excellent
More accessible for orienteering events
More bins
More dog poo bins
More of the same
More wooden board ways and hardcore needed
Motor bikes making a mess of parks. Appreciate the bridges on common
Mowed orchids by office... keeping open access
Nice for dog
No
No litter is good
No more building
No more restrictions on access
On the common, sheep have been getting into the enclosed paths making it difficult to take dogs on walks there
Other people leaving gates open and bags of poo
Peaceful
Police motorbikes on site needed
Problem with adders
Really peaceful
Rubbish needs picking up
Sewage works smells a bit
Shame fences put up
Sheep a two edged sword as good for keeping scrub down but they restricts dogs of leads. Youths using car park, lighting fires and leaving litter an issue. New dog bins better.
Sometimes dog bins overflowing particularly near housing. Boy racer cars in car park. Cattle grid very noisy for locals when cars driving over, particularly at night. Hooter at 7.30am for dog walkers to come off is it really necessary as some people work nights. Could do with benches along side of track as some elderly people use route.
Unspoilt and well kept
Useful to know where the sheep are
Value public access
Very positive

Visitor surveys and impacts of recreation at  
Strensall Common

Wants woodland not heath

Wardens could do more

Well managed. Should be protected as wild green space

Why cut pine trees?

Worried about snakes

Worries about future, better as is

Would not like any more fencing





## **E. Policy Changes**

### **Appendices**

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1

## Policy Modifications Proposed

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NB: Additional text is **bold and underlined**; Deleted text is ~~bold and struckthrough~~.

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### Policy EC1: Employment Allocations

Site	Floorspace	Suitable Employment uses
E18: Towthorpe Lines, Strensall (4ha)*	13,200sqm	B1c, B2 and B8 uses.
<p><b><u>* Policy SS19 points i. – ii. apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and <u>Given the site's proximity to Strensall Common SAC (see explanatory text), this site</u> must <del>also</del> take account of Policy GI2.</u></b></p>		

New Explanatory Text:

**The location of allocation E18 adjacent to Strensall Common SAC means that a comprehensive evidence base to understand the potential impacts on biodiversity from further development is required. Strensall Common is designated for it's heathland habitats but also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered. Although the common is already under intense recreational pressure, there are birds of conservation concern amongst other species and habitats which could be harmed by the intensification of disturbance. In addition, the heathland habitat is vulnerable to changes in the hydrological regime and air quality, which needs to be explored in detail. The mitigation hierarchy should be used to identify the measures required to first avoid impacts, then to mitigate unavoidable impacts or compensate for any unavoidable residual impacts, and be implemented in the masterplanning approach. Potential access points into the planned development also need to consider impacts on Strensall Common.**

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### Policy GI2: Biodiversity and Access to Nature

In order to conserve and enhance York's biodiversity, any development should where appropriate:

- i. **determine if they are likely to have a significant effect on an International Site in the context of the statutory protection which is afforded to the site.**

- ii. demonstrate that proposals will not have an adverse effect on a National Site (alone or in combination). Where adverse impacts occur, development will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of National Sites.**
- iii. demonstrate that where loss or harm to a National site cannot be prevented or adequately mitigated, as a last resort, provide compensation for the loss/harm. Development will be refused if loss or significant harm cannot be prevented, adequately mitigated against or compensated for.**
- i. iv.** avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs) **and Local Nature Reserves (LNRs)**, whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;
- ii. v.** ensure the retention, enhancement and appropriate management of features of geological, or biological interest, and further the aims of the current Biodiversity Audit and Local Biodiversity Action Plan;
- iii. vi.** take account of the potential need for buffer zones around wildlife and biodiversity sites, to ensure the integrity of the site's interest is retained;
- iv. vii.** result in net gain to, and help to improve, biodiversity;
- v. viii.** enhance accessibility to York's biodiversity resource where this would not compromise their ecological value, affect sensitive sites or be detrimental to drainage systems;
- vi. ix.** maintain and enhance the rivers, banks, floodplains and settings of the Rivers Ouse, Derwent and Foss, and other smaller waterways for their biodiversity, cultural and historic landscapes, as well as recreational activities where this does not have a detrimental impact on the nature conservation value;
- vii. x.** maintain water quality in the River Ouse, River Foss and River Derwent to protect the aquatic environment, the interface between land and river, and continue to provide a viable route for migrating fish. New development within the catchments of these rivers will be permitted only where sufficient capacity is available at the appropriate wastewater treatment works. Where no wastewater disposal capacity exists, development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of the River Derwent, Lower Derwent Valley and Humber Estuary European Sites;
- viii. xi.** maintain and enhance the diversity of York's Strays for wildlife; and
- ix. xii.** ensure there is no detrimental impact to the environmental sensitivity and significant Lower Derwent Valley and its adjacent functionally connected land which whilst not designated, are ultimately important to the function of this important site.



## **F. Air Quality Assessment**

### **Appendices**

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

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## **Air Quality Assessment**

### **Air Quality Modelling Assessment**

April 2018

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### Quality Assurance – Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

Issue	Date	Prepared by	Checked by	Approved by
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Final	25 April 2018	Chris Brownlie Principal Consultant 	Kirsty Rimondi Technical Director	Guido Pellizzaro Associate Director 

**Comments**

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**Comments**

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## Disclaimer

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**Appendices**

Appendix A Air Quality Assessment Detailed Methodology



## 1. Introduction

- 1.1. The City of York Council (CYC) is developing its Local Plan. This will deliver the strategic vision and objectives in York over a 20-year period described in the Pre-Publication Draft Local Plan (Regulation 18) Consultation document<sup>1</sup>. When adopted, the Local Plan will influence all future development within the City Council's boundaries. Atmospheric emissions from additional vehicles because of the Local Plan have the potential to impact on ecological sites within York
- 1.2. The purpose of this air quality assessment is to predict the potential effect of the Local Plan on local air quality specifically in relation to ecological sites. The most significant pollutant associated with road traffic emissions in relation to ecological sites is Nitrogen Dioxide (NO<sub>x</sub>) and Nitrogen Deposition. Therefore, this assessment focuses on these pollutant.
- 1.3. The results of the air quality modelling are presented in this report and are compared to the relevant Critical Level for NO<sub>x</sub> and the Critical Load for Nitrogen Deposition (defined in Chapter 2: Air Quality Legislation and Planning Policy) for each ecological designated site. The results are considered against the relevant screening criteria, where these results cannot be screened as being insignificant, further consideration of the significance in relation to the relevant ecological sites is provided in the Habitats Regulations Assessment (HRA).
- 1.4. Section 2 of this air quality assessment gives a summary of legislation, planning policy and guidance relevant to air quality. Section 3 provides details of the assessment methodology and Section 4 sets out the baseline conditions. The results of the assessments are presented in Section 5. A summary of the findings and conclusions of the assessment is given in Section 6. The air quality assessment is supported by: **Appendix A: Air Quality Assessment Detailed Methodology**.

<sup>1</sup> [https://www.york.gov.uk/downloads/download/4036/pre-publication\\_draft\\_local\\_plan\\_reg\\_18\\_consultation](https://www.york.gov.uk/downloads/download/4036/pre-publication_draft_local_plan_reg_18_consultation)



## 2. Air Quality Legislation and Planning Policy

### Legislation

#### European Union Framework Directive

- 2.1. Air pollutants at high concentrations can give rise to adverse impacts on the health of humans and ecosystems. European Union (EU) legislation on air quality forms the basis for national UK legislation and policy on air quality.
- 2.2. The European Union Framework Directive 2008/50/EC<sup>2</sup> on ambient air quality assessment and management came into force in May 2008 and was implemented by Member States, including the UK, by June 2010. The Directive aims to protect human health and the environment by avoiding, reducing or preventing harmful concentrations of air pollutants.

#### Air Quality Standards Regulations

- 2.3. The Air Quality Standards Regulations 2010<sup>3</sup> implement Limit Values prescribed by the Directive 2008/50/EC. The Limit Values are legally binding and the Secretary of State, on behalf of the UK Government, is responsible for their implementation.

#### The UK Air Quality Strategy

- 2.4. The Environment Act 1995<sup>4</sup> required the preparation of a national air quality strategy setting health-based air quality objectives for specified pollutants and outlining measures to be taken by local authorities in relation to meeting these (the Local Air Quality Management (LAQM) regime).
- 2.5. The current UK Air Quality Strategy (UK AQS) was published in 2007<sup>5</sup> and sets out air quality objectives for local authorities to meet when undertaking their LAQM duties. Objectives in the UK AQS are in some cases more onerous than the Limit Values set out within the relevant EU Directives and the Air Quality Standards Regulations 2010. In addition, objectives have been established for a wider range of pollutants.
- 2.6. Currently it is a Local Authority's responsibility to determine the effect of a development against the UK AQS objectives.

#### Critical Level

- 2.7. Critical Levels relate to effects on plant physiology, growth and vitality, and are expressed as atmospheric concentrations over an averaging time and are defined by the UN ECE<sup>6</sup> as:
 

*“concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge”.*
- 2.8. The critical levels for NO<sub>x</sub> are set by in the EU Ambient Air Quality Directive and transposed into law by the Air Quality Standards Regulations. The Critical Levels for NO<sub>x</sub> relevant to this assessment are summarised in Table 1 below.

<sup>2</sup> European Council Directive 2008/50/EC of 21 May 2008 on ambient air quality and cleaner air for Europe

<sup>3</sup> Defra, 2010, 'The Air Quality Standards Regulations'

<sup>4</sup> Office of the Deputy Prime Minister (ODPM), 1995, 'The Environment Act 1995'

<sup>5</sup> Defra, 2007, 'The Air Quality Strategy for England, Scotland, Wales & Northern Ireland'

<sup>6</sup> <http://www.unece.org/env/lrtap/WorkingGroups/wge/definitions.htm>





Table 1: Summary of Relevant Critical Level for Ecological Sites

Pollutant	Critical Level	Averaging Period
Nitrogen Oxides (NO <sub>x</sub> )	30µg/m <sup>3</sup>	Annual Mean
	75µg/ m <sup>3</sup>	24 Hour Mean

- 2.9. Several studies<sup>7,8</sup> have indicated that the 'UN/ECE Working Group on Effects strongly recommended the use of the annual mean value, as the long-term effects of NO<sub>x</sub> are thought to be more significant than the short-term effects'. Therefore, this assessment only considers the annual mean NO<sub>x</sub> concentration.

### Critical Loads

- 2.10. A Critical Load is defined by the Air Pollution Information System (APIS)<sup>9</sup> as:

*"A quantitative estimate of exposure to deposition of one or more pollutants, below which significant harmful effects on sensitive elements of the environment do not occur, according to present knowledge. The exceedance of a critical load is defined as the atmospheric deposition of the pollutant above the critical load."*

- 2.11. When pollutant loads (or concentrations) exceed the Critical Load, it is considered that there is a risk of harmful effects. The excess over the critical load is termed the exceedance. A larger exceedance is often considered to represent a greater risk of damage.
- 2.12. Maps of Critical Loads and their exceedances are used to show the potential extent of pollution damage and aid in developing strategies for reducing pollution. Decreasing deposition below the Critical Load is seen as means for preventing the risk of damage. However, even a decrease in the exceedance may infer that less damage will occur.
- 2.13. Critical Loads have been designated within the UK based on the sensitivity of the receiving habitat and have been reviewed for this assessment. Further information on the Critical Loads considered in this air quality assessment are discussed below (under the heading Background Concentrations).

<sup>7</sup> Sutton et al. (2013), The European Nitrogen Assessment: Sources, Effects and Policy Perspectives. Page 414. Cambridge University Press. 664pp. ISBN-10:1107006120

<sup>8</sup> June 2011. Manual on Methodologies and Criteria for Modelling and Mapping Critical Loads & Levels and Air Pollution Effects, Risks and Trends. Chapter 3: Mapping Critical Levels for Vegetation

<sup>9</sup> <http://www.apis.ac.uk/>



### 3. Assessment Methodology and Significance

#### Assessment Methodology

3.1. This air quality assessment was undertaken using a variety of information and procedures as follows:

- a review of the APIS website<sup>10</sup> to identify the baseline conditions within the relevant ecological sites and those habitats sensitive to changes in NO<sub>x</sub> and nitrogen deposition;
- application of the ADMS-Roads dispersion model to predict the Process Contribution (PC) from the traffic flows associated within the Local Plan (details of the dispersion modelling are presented in Appendix A);
- the calculation of the total Predicted Environmental Concentration (PEC) which includes the PC combined with the existing baseline concentration;
- comparison of the predicted air pollutant concentrations with the relevant Critical Level and Critical Load; and
- determination of the likely significant effects of the Local Plan on air quality within the ecological sites using the Defra and Environment Agency online guidance document<sup>11</sup>.

#### Model Verification

3.2. Model verification is the process of comparing monitored and modelled pollutant concentrations and, if necessary, adjusting the modelled results to reflect actual measured concentrations, to improve the accuracy of the modelling results. The model has been verified by comparing the predicted annual mean NO<sub>2</sub> concentrations for the baseline year of 2016, with results from the CYC monitoring locations. The verification and adjustment process is described in detail in **Appendix A**.

#### Atmospheric Chemistry

##### Nitrogen Deposition

- 3.3. Nitrogen deposition rates were calculated using the conversion factors provided within the EA AQTAG<sup>12</sup> document.
- 3.4. Predicted pollutant concentrations were multiplied by the relevant deposition velocity and conversion factor to calculate the dry deposition flux. The conversion factors used for the determination of nitrogen deposition are presented within Table 2.

<sup>10</sup> <http://www.apis.ac.uk/>

<sup>11</sup> Defra and Environment Agency (2016) Guidance: 'Air emissions risk assessment for your environmental permit' <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit> last updated 2 August 2016

<sup>12</sup> Environment Agency (2006), Technical Guidance on Detailed Modelling approach for an Appropriate Assessment for Emissions to Air AQTAG 06



Table 2: Conversion Factors to Determine Dry Deposition

Pollutant	Deposition Velocity (m/s)	Conversion Factor ( $\mu\text{g}/\text{m}^2/\text{s}$ to $\text{kg}/\text{ha}/\text{yr}$ of pollutant species)
NO <sub>x</sub>	0.0015	96

- 3.5. The PC and PEC proportion of the Critical Level or Critical Load were then calculated using the critical loads as presented on the APIS website<sup>13</sup> and presented in the subheading Baseline Critical Loads below.

### Sensitive Receptors

- 3.6. Tailpipe emissions from the additional vehicles as a result of the Local Plan have the potential to impact on ecological sites within York. The study was completed using the APIS website to identify habitats that may be sensitive to changes in NO<sub>x</sub> as well as Nitrogen Deposition. A summary of those habitats is provided in Table 3.
- 3.7. Results have been modelled along a transect at intervals of 1-5m; 10m; 15m; 20m; 25m; 50m; 100m; and 150m intervals from the roadside, additionally concentrations were modelled as a grid with a resolution of 20m across each of the ecological sites. **Figures 1 - 7** show the locations of the transects within each of the ecological sites.

<sup>13</sup> [www.apis.ac.uk](http://www.apis.ac.uk)



Table 3: Habitat Description

Site	
Strensall Common	<ul style="list-style-type: none"> <li>Dwarf shrub heath (<i>Calluna vulgaris</i> - <i>Deschampsia flexuosa</i> heath) &amp; (<i>Erica tetralix</i> - <i>Sphagnum compactum</i> wet heath);</li> <li>Fen, marsh and swamp (<i>Molinia caerulea</i> - <i>Potentilla erecta</i> mire)</li> <li>Northern wet heath: <i>Erica tetralix</i> dominated wet heath</li> <li>European dry heaths (H4030)</li> </ul>
Clifton Ings	<ul style="list-style-type: none"> <li>Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland), (<i>Cynosurus cristatus</i> - <i>Caltha palustris</i> grassland)</li> </ul>
Fulford Ings	<ul style="list-style-type: none"> <li>Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)</li> <li>Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)</li> </ul>
Askham Bog	<ul style="list-style-type: none"> <li>Broad-leaved, mixed and yew woodland (<i>Alnus glutinosa</i> - <i>Urtica dioica</i> woodland); <i>Quercus robur</i> - <i>Pteridium aquilinum</i> - <i>Rubus fruticosus</i> woodland)</li> <li>Fen, marsh and swamp (<i>Juncus effusus</i> / <i>acutiflorus</i> - <i>Galium palustre</i> rush pasture)</li> <li>Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)</li> </ul>
Church Ings	<ul style="list-style-type: none"> <li>Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)</li> </ul>
Acaster South Ings	<ul style="list-style-type: none"> <li>Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)</li> </ul>
River Derwent	<ul style="list-style-type: none"> <li>Fen, marsh and swamp (<i>Carex echinata</i> - <i>Sphagnum recurvum</i> (fallax) / <i>auriculatum</i> (denticulatum) mire)</li> <li>Fen, marsh and swamp (<i>Juncus effusus</i> / <i>acutiflorus</i> - <i>Galium palustre</i> rush pasture)</li> <li>Fen, marsh and swamp (<i>Filipendula ulmaria</i> - <i>Angelica sylvestris</i> mire)</li> <li>Broad-leaved, mixed and yew woodland (<i>Salix cinerea</i> - <i>Galium palustre</i> woodland) (<i>Alnus glutinosa</i> - <i>Fraxinus excelsior</i> - <i>Lysimachia nemorum</i> woodland)</li> </ul>
Lower Derwent	<ul style="list-style-type: none"> <li>Acid grassland (<i>Festuca ovina</i> - <i>Agrostis capillaris</i> - <i>Galium saxatile</i> lowland acid grassland (U4a))</li> <li>Neutral grassland (<i>Cynosurus cristatus</i> - <i>Centaurea nigra</i> grassland)</li> </ul>

Note: Habitat descriptions taken from APIS website

### Assessment Criteria

- 3.8. The Defra and Environment Agency online guidance<sup>11</sup> states that the PC can be considered insignificant if:
- the short-term PC is less than 10% of the short-term environmental standard (Critical Level for NO<sub>x</sub> or Critical Load for nitrogen deposition); and
  - the long-term PC is less than 1% of the long-term environmental standard.
- 3.9. If these criteria are exceeded the following guidance is provided on when further consideration of potential impacts may be useful:
- the short-term PC is less than 20% of the short-term environmental standard minus twice the long-term background concentration; and
  - the long-term PEC is less than 70% of the long-term environmental standard.
- 3.10. If these criteria are achieved, then predicted impacts are insignificant. Where these criteria are not achieved the results have been passed to the project ecologist for further consideration.



## 4. Baseline Conditions

### City of York Review and Assessment

- 4.1. CYC completed a First Stage Review and Assessment of air quality in December 1998<sup>14</sup>. This determined that the AQS objectives for CO, Benzene (C<sub>6</sub>H<sub>6</sub>), 1,3 butadiene (C<sub>4</sub>H<sub>6</sub>), and lead (Pb) were not at risk of being exceeded. However, it also concluded that further stages of review and assessment were required for NO<sub>2</sub>, SO<sub>2</sub> and PM<sub>10</sub>.
- 4.2. A Second and Third Stage Review and Assessment of air quality was undertaken in February 2000<sup>15</sup>. This report concluded that the air quality objectives for SO<sub>2</sub> and PM<sub>10</sub> would be met. The report also predicted breaches of the annual average NO<sub>2</sub> objective at five locations around the inner ring road.
- 4.3. Therefore, CYC declared an AQMA at these five locations around the inner ring road, for the annual mean NO<sub>2</sub> AQS objective in January 2002, this AQMA was subsequently amended in 2012 to include the 1-hour mean NO<sub>2</sub> AQS objective as several properties within the AQMA. An AQMA was also declared in 2010 for the annual mean NO<sub>2</sub> objective for an area along Fulford Road, Main Street and Selby Road.
- 4.4. CYC undertook an Updating and Screening Assessment (USA) in 2015<sup>16</sup> and an Annual Status Report in 2017<sup>17</sup>, the findings of both confirmed that 1,3 butadiene, CO, Pb, Benzene and SO<sub>2</sub> still met the objective levels and therefore did not require a Detailed Assessment. While there had been a slight increase in concentrations in 2016 compared with 2015 there was evidence of a steady downward trend in nitrogen dioxide concentrations within York over the last 7 years.
- 4.5. Air quality modelling work undertaken by CYC indicates that with the proposed third Air Quality Action Plan (AQAP3) measures in place, the air quality objectives for NO<sub>2</sub> will be met across York by 2021.

### City of York Air Quality Monitoring Data

- 4.6. CYC currently undertakes monitoring at nine locations within the City of York using automatic monitors. Of these nine locations, eight of the locations monitor NO<sub>2</sub>, four monitor PM<sub>10</sub> and three monitors PM<sub>2.5</sub>. NO<sub>2</sub> was also measured at 234 locations using diffusion tubes.
- 4.7. The results for the Fulford Road monitoring location classified as a roadside location, are presented in **Table 4** below for 2016 and 2017. Fulford Road monitoring location is presented as it is located approximately 0.5km from the Fulford Ings ecological site.

Table 4: Measured Concentrations at the Fulford Road Roadside Automatic Monitor

Pollutant	2016	2017
NO <sub>x</sub>	59	55
NO <sub>2</sub>	25	23

- 4.8. The monitoring results in **Table 4** indicate that the annual mean NO<sub>x</sub> objective of 30µg/m<sup>3</sup> (for ecological sites) was exceeded in 2016 and 2017. The results for the nearest nitrogen diffusion tube roadside locations to the selected ecological sites are presented in **Table 5**.

<sup>14</sup> City of York Council (1998) First Stage Review and Assessment of Air Quality

<sup>15</sup> City of York Council (2000) Second and Third Stage Review and Assessment

<sup>16</sup> City of York Council, Updating and Screening Assessment for City of York Council, April 2015.

<sup>17</sup> City of York Council, 2017 Air Quality Annual Status Report, June 2017.



Table 5: Measured Concentrations at the City of York Diffusion Tubes

Site ID	Name	Distance to nearest ecological Site	2013	2014	2015	2016
47	Strensall Road	4.3km Strensall Common	28.2	28.0	27.6	28.3
A12	7 Clifton Green (Lamppost)	1.0km Clifton Ings	30.7	33.8	28.7	29.0
A96	Ousecliffe Gardens (signpost, outside 31 Water End)	0.9km Clifton Ings	31.5	34.4	28.4	31.7
C29	34 Selby Road (Lamppost)	0.7km Fulford Ings	30.2	33.5	28.8	30.0
C30	2 Selby Road (Lamppost)	0.7km Fulford Ings	34.0	35.2	29.3	30.8
C34	103 Main St	0.3km Fulford Ings	26.6	28.6	23.7	25.2
C36	50 Main St	0.3km Fulford Ings	26.9	30.8	29.7	28.5
C38	8 Main St (Lamppost)	0.3km Fulford Ings	30.7	30.8	28.2	28.1
C39	18 Main St	0.4km Fulford Ings	31.5	35.3	35.1	32.6
C58	4 Main St (Drainpipe)	0.4km Fulford Ings	36.3	39.5	36.8	35.5
95a/b/c	Fulford AQS	0.5km Fulford Ings	25.2	26.0	24.7	23.7
C43/43a/44	39 Fulford (Lamppost)	0.5km Fulford Ings	29.4	31.1	28.0	29.4

- 4.9. The monitoring results in **Table 5** indicate that the annual mean NO<sub>2</sub> objective of 40µg/m<sup>3</sup> has been met at all monitoring locations between 2013 and 2016.

### Background Concentrations

- 4.10. The ADMS Roads model has been used to model pollutant concentrations at the ecological receptors. To estimate the total concentrations due to the contribution of any other nearby sources of pollution, background pollutant concentrations need to be added to the modelled concentrations.
- 4.11. Current NO<sub>x</sub> and nitrogen deposition concentrations within the ecological sites have been taken from the APIS website. The website presents a range of concentrations for each ecological site, **Table 6** presents the maximum NO<sub>x</sub> and Nitrogen Deposition concentrations from the APIS website for each ecological site which have been used in the assessment. The year 2033 is presented as this is the final year which the Local Plan covers.





Table 6: APIS Background Concentrations ( $\mu\text{g}/\text{m}^3$ )



Site		NOx ( $\mu\text{g}/\text{m}^3$ )		Nitrogen Deposition (KgN ha/yr)	
		2015	2033	2015	2033
Strensall Common	• Dwarf shrub heath ( <i>Calluna vulgaris</i> - <i>Deschampsia flexuosa</i> heath) & ( <i>Erica tetralix</i> - <i>Sphagnum compactum</i> wet heath)				
	• Fen, marsh and swamp ( <i>Molinia caerulea</i> - <i>Potentilla erecta</i> mire)	13.13	8.40	24.08	15.41
	• Northern wet heath: <i>Erica tetralix</i> dominated wet heath				
	• European dry heaths (H4030)				
Clifton Ings	• Neutral grassland ( <i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland), ( <i>Cynosurus cristatus</i> - <i>Caltha palustris</i> grassland)	26.65	17.06	21.84	13.98
Fulford Ings	• Neutral grassland ( <i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)	19.69	12.60	21.14	13.53
	• Fen, marsh and swamp ( <i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)				
Askham Bog	• Broad-leaved, mixed and yew woodland ( <i>Alnus glutinosa</i> - <i>Urtica dioica</i> woodland); <i>Quercus robur</i> - <i>Pteridium aquilinum</i> - <i>Rubus fruticosus</i> woodland)				
	• Fen, marsh and swamp ( <i>Juncus effusus</i> / <i>acutiflorus</i> - <i>Galium palustre</i> rush pasture)	22.02	14.09	34.58	22.13
	• Fen, marsh and swamp ( <i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)				
Church Ings	• Neutral grassland ( <i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)	15.26	9.77	20.58	13.17
Acaster South Ings	• Neutral grassland ( <i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)	14.78	9.46	18.90	12.10
River Derwent	• Fen, marsh and swamp ( <i>Carex echinata</i> - <i>Sphagnum recurvum</i> (fallax) / <i>auriculatum</i> (denticulatum) mire)				
	• Fen, marsh and swamp ( <i>Juncus effusus</i> / <i>acutiflorus</i> - <i>Galium palustre</i> rush pasture)				
	• Fen, marsh and swamp ( <i>Filipendula ulmaria</i> - <i>Angelica sylvestris</i> mire)				
	• Broad-leaved, mixed and yew woodland ( <i>Salix cinerea</i> - <i>Galium palustre</i> woodland) ( <i>Alnus glutinosa</i> - <i>Fraxinus excelsior</i> - <i>Lysimachia nemorum</i> woodland)	16.26	10.40	14.56	9.32
	• Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation (H3260)				
	• <i>Petromyzon marinus</i> - Sea lamprey (S1095)				
	• <i>Lampetra fluviatilis</i> - River lamprey (S1099)				
	• <i>Cottus gobio</i> - Bullhead (S1163)				
• <i>Lutra lutra</i> - Otter (S1355)					



Lower Derwent	• Acid grassland ( <i>Festuca ovina</i> - <i>Agrostis capillaris</i> - <i>Galium saxatile</i> lowland acid grassland (U4a))				
	• Neutral grassland ( <i>Cynosurus cristatus</i> - <i>Centaurea nigra</i> grassland)				
	• Lowland hay meadows ( <i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i> ) (H6510)				
	• Lutra lutra - Otter (S1355)				
	• Anas penelope (Western Siberia/North-western/North-eastern Europe) - Eurasian wigeon (A050)	17.18	11.00	17.36	11.11
	• Anas crecca (North-western Europe) - Eurasian teal (A052)				
	• Anas clypeata (North-western/Central Europe) - Northern shoveler (A056)				
	• Pluvialis apricaria [North-western Europe - breeding] - European golden plover (A140)				
	• Philomachus pugnax (Western Africa - wintering) - Ruff (A151)				
	• Cygnus columbianus bewickii (Western Siberia/North-eastern & North-western Europe) - Tundra swan (A037)				

Note: As per the DMRB guidance the APIS background concentrations have been reduced by 2% per year to estimate concentrations for the assessment year

## Baseline Critical Loads

### Nitrogen Deposition

- 4.12. The critical loads for nitrogen deposition for each of the ecological sites to be considered have been taken from APIS and are presented in **Table 7**. The 2033 deposition rates from **Table 6** are presented to represent the current levels experienced within the ecological sites so a comparison with the Critical Loads can be made and identify if the Critical Loads within the ecological site are likely to be exceeded.



Table 7: Critical Loads for Nitrogen Deposition (2033)

Habitat		Critical Load (kgN/ha/yr)		Nitrogen Deposition (kgN ha/yr)	Headroom (kgN/ha/yr)	
		Low Limit	High Limit		Low Limit	High Limit
Strensall Common	Dwarf Shrub Heath / Northern Wet Heath / European Dry Heaths	10	20	15.41	-5.41	4.59
	Fen, Marsh and Swamp	15	25	15.41	-0.41	9.59
Clifton Ings	Neutral Grassland	20	30	13.98	6.02	16.02
Fulford Ings	Neutral grassland	20	30	13.53	6.47	16.47
	Fen, Marsh and Swamp	15	30	13.53	1.47	16.47
Askham Bog	Broad-leaved, Mixed and Yew Woodland	10	20	22.13	-12.13	-2.13
	Fen, Marsh and Swamp	15	25	22.13	-7.13	2.87
	Fen, Marsh and Swamp	15	30	22.13	-7.13	12.87
Church Ings	Neutral Grassland	20	30	13.17	6.83	16.83
Acaster South Ings	Neutral Grassland	20	30	12.10	7.90	17.90
River Derwent	Fen, Marsh and Swamp	10	15	9.32	0.68	5.68
	Fen, Marsh and Swamp	15	25	9.32	5.68	15.68
	Fen, Marsh and Swamp / Broad-leaved, Mixed and Yew Woodland	15	30	9.32	5.68	20.68
Lower Derwent	Acid Grassland	10	15	11.11	-1.11	3.89
	Neutral Grassland / Lowland Hay Meadows	20	30	11.11	8.89	18.89

- 4.13. As shown in **Table 7**, the current Critical Loads in 2033 for the Lower Limits are exceeded at the Strensall Common and Askham Bog and Church Ings ecological sites. The lower level is also exceeded for the Acid Grassland habitat at the Lower Derwent ecological site. The Higher Limit is also exceeded for the Broad-leaved, mixed and yew woodland habitat at the Askham Bog ecological site all other Higher Limits for the remaining habitats and sites are met.



## 5. Air Quality Assessment

### Annual Mean NO<sub>x</sub>

- 5.1. The modelling results for the maximum predicted annual mean NO<sub>x</sub> concentration at the ecological receptors due to traffic emissions are summarised in **Table 8**. **Figure 8** shows the location of the maximum predicted concentration within each of the ecological sites.

Table 8: Maximum Predicted Annual Mean NO<sub>x</sub> Concentrations

Receptor	Grid Reference of Receptor	Predicted Annual Mean NO <sub>x</sub> Concentration (µg/m <sup>3</sup> )		Proportion of Critical Level (%)	
		PC	PEC	PC	PEC
Strensall Common	463590, 460035	1.95	10.35	6.5	34.5
Clifton Ings	458510, 452590	0.14	17.20	0.5	57.3
Fulford Ings	461087, 448678	3.46	16.06	11.5	53.5
Askham Bog	456840, 447700	0.53	14.62	1.8	48.7
Church Ings	459465, 445780	0.02	9.79	0.1	32.6
Acaster South Ings	459360, 444360	0.01	9.47	0.0	31.6
River Derwent	470500, 451120	1.39	11.79	4.6	39.3
Lower Derwent	470480, 446350	0.03	11.03	0.1	36.8

- 5.2. As shown in **Table 8** predicted NO<sub>x</sub> concentrations are below the annual mean Critical Level of 30µg/m<sup>3</sup> at all ecological receptor locations. The PC is below the criteria for insignificant impacts at the Clifton Ings, Church Ings, Acaster South Ings and Lower Derwent ecological sites, the PEC is also below the criteria for insignificant impacts at the Strensall Common, Fulford Ings, Askham Bog and River Derwent ecological sites, as such the predicted effects on annual mean NO<sub>x</sub> concentrations are considered insignificant.

### Nitrogen Deposition

- 5.3. The results of the maximum nitrogen deposition modelling are summarised in **Table 9**.



Table 9: Maximum Predicted Nitrogen Deposition

Receptor		Process Contribution (kgN/ha/yr)		Proportion of Critical Load (%)			
		PC	PEC	PC		PEC	
				Low	High	Low	High
Strensall Common	Dwarf shrub heath	0.28	15.69	2.8	1.4	157	78
	Northern wet heath						
	European dry heaths (H4030)						
	Fen, marsh and swamp	0.28	15.69	1.9	1.1	105	63
Clifton Ings	Neutral Grassland	0.02	14.00	0.1	0.1	70	47
Fulford Ings	Neutral grassland	0.50	14.03	2.5	1.7	70	47
	Fen, marsh and swamp	0.50	14.03	3.3	1.7	94	47
Askham Bog	Broad-leaved, mixed and yew woodland	0.08	22.21	0.8	0.4	222	111
	Fen, marsh and swamp	0.08	22.21	0.5	0.3	148	89
	Fen, marsh and swamp	0.08	22.21	0.5	0.3	148	74
Church Ings	Neutral grassland	0.002	13.17	0.0	0.0	66	44
Acaster South Ings	Neutral grassland	0.001	12.10	0.0	0.0	61	40
River Derwent	Fen, marsh and swamp	0.20	9.52	2.0	1.3	95	63
	Fen, marsh and swamp	0.20	9.52	1.3	0.8	63	38
	Fen, marsh and swamp / Broad-leaved, mixed and yew woodland	0.20	9.52	1.3	0.7	63	32
Lower Derwent	Acid Grassland	0.004	11.11	0.0	0.0	111	74
	Neutral Grassland	0.004	11.11	0.0	0.0	56	37

- 5.4. As shown in **Table 9**, the maximum PCs are below the criteria for insignificant impacts considering both the low and high Critical Loads at the Clifton Ings, Askham Bog, Church Ings, Acaster South Ings, and Lower Derwent ecological sites, it is considered the impact is **insignificant** at these ecological sites. The maximum PEC is below the criteria for insignificant impacts, considering the high Critical Load, for the Fen, Marsh and Swamp habitat at the Strensall Common ecological site, the Fulford Ings ecological site, and the River Derwent ecological site, it is considered the impact is **insignificant** at these ecological sites.
- 5.5. The PC and PEC for the Dwarf shrub heath at the Strensall Common ecological site is above the criteria for insignificant impacts and can therefore not be screened out at this stage, further consideration to the significance of impacts at this site is considered further in the HRA.

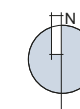
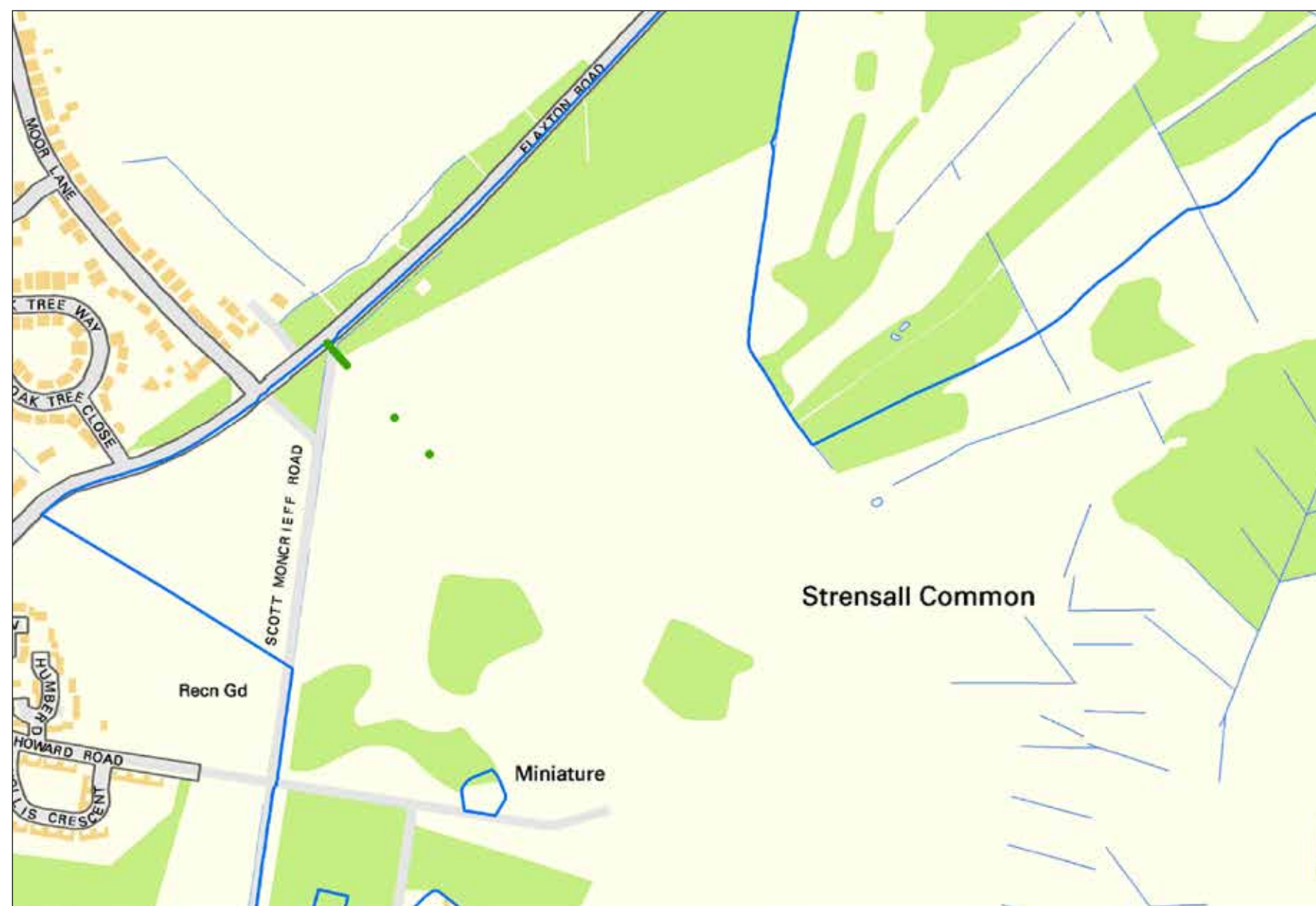
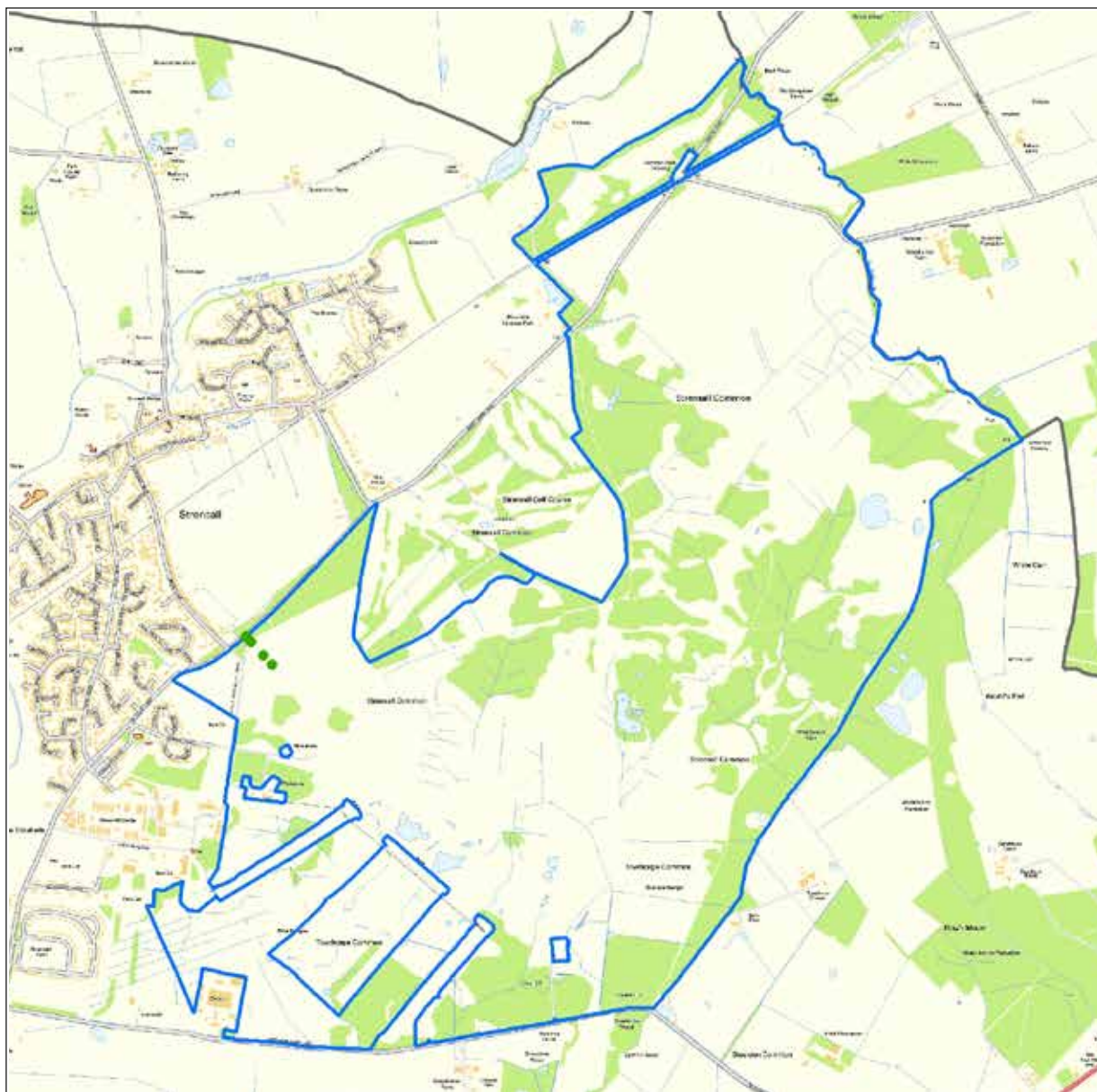




## 6. Summary and Conclusions

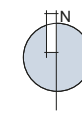
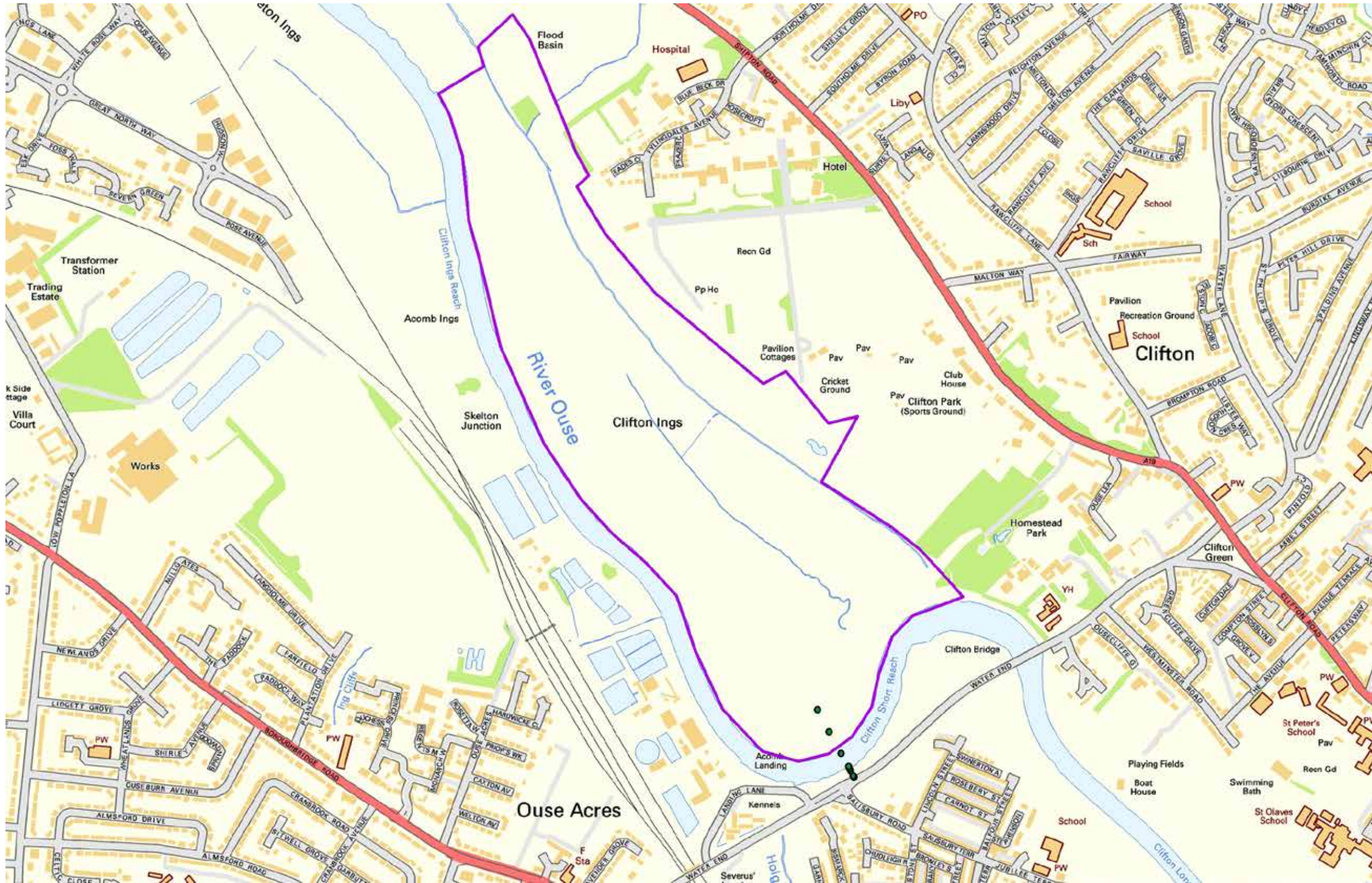
6.1. Overall the assessment has identified that following the adoption of the Local Plan:

- the predicted effects on annual mean NO<sub>x</sub> concentrations are considered insignificant at all ecological sites;
- the predicted effects on nitrogen deposition is insignificant at most ecological sites, however the impacts at the Dwarf shrub heath at the Strensall Common ecological site cannot be screened out at this stage. Therefore, further consideration to the significance of impacts at this site is considered within the HRA.



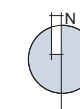
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Figure Title	Figure 1: Strensall Common Transect Location
Figure Ref	WIE13194-103_GR_AQ_1A
Date	April 2018
File Location	\\s-incs\wiel\projects\wie13194\103\graphics\laq\issued figures



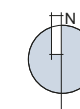


Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 2: Clifton Ings Transect Location
Figure Ref	WIE13194-103_GR_AQ_2A
Date	April 2018
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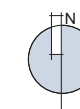


Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 3: Fulford Ings Transect Location
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Date	April 2018
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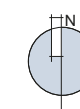
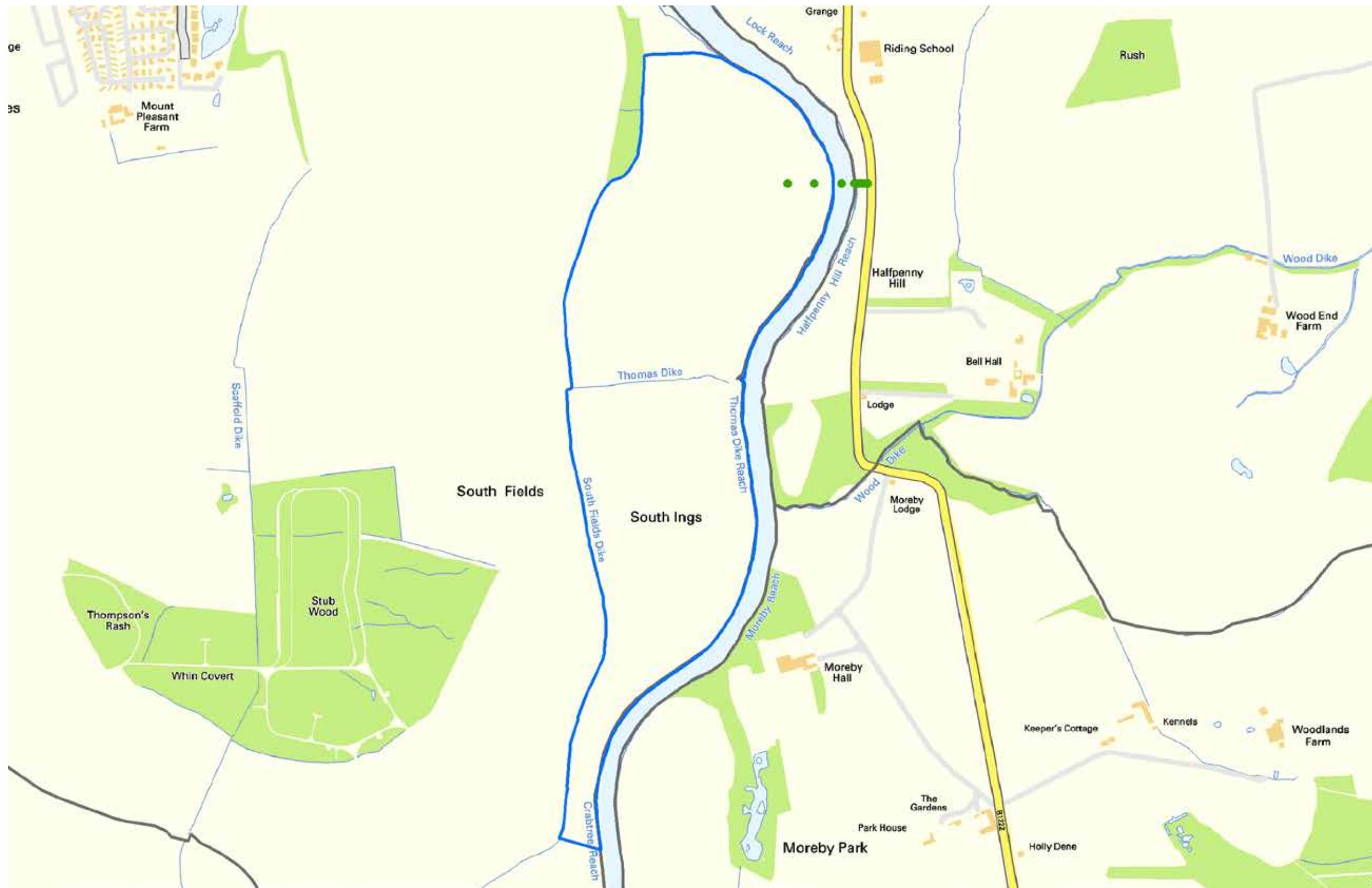
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Date	April 2018
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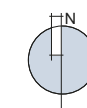
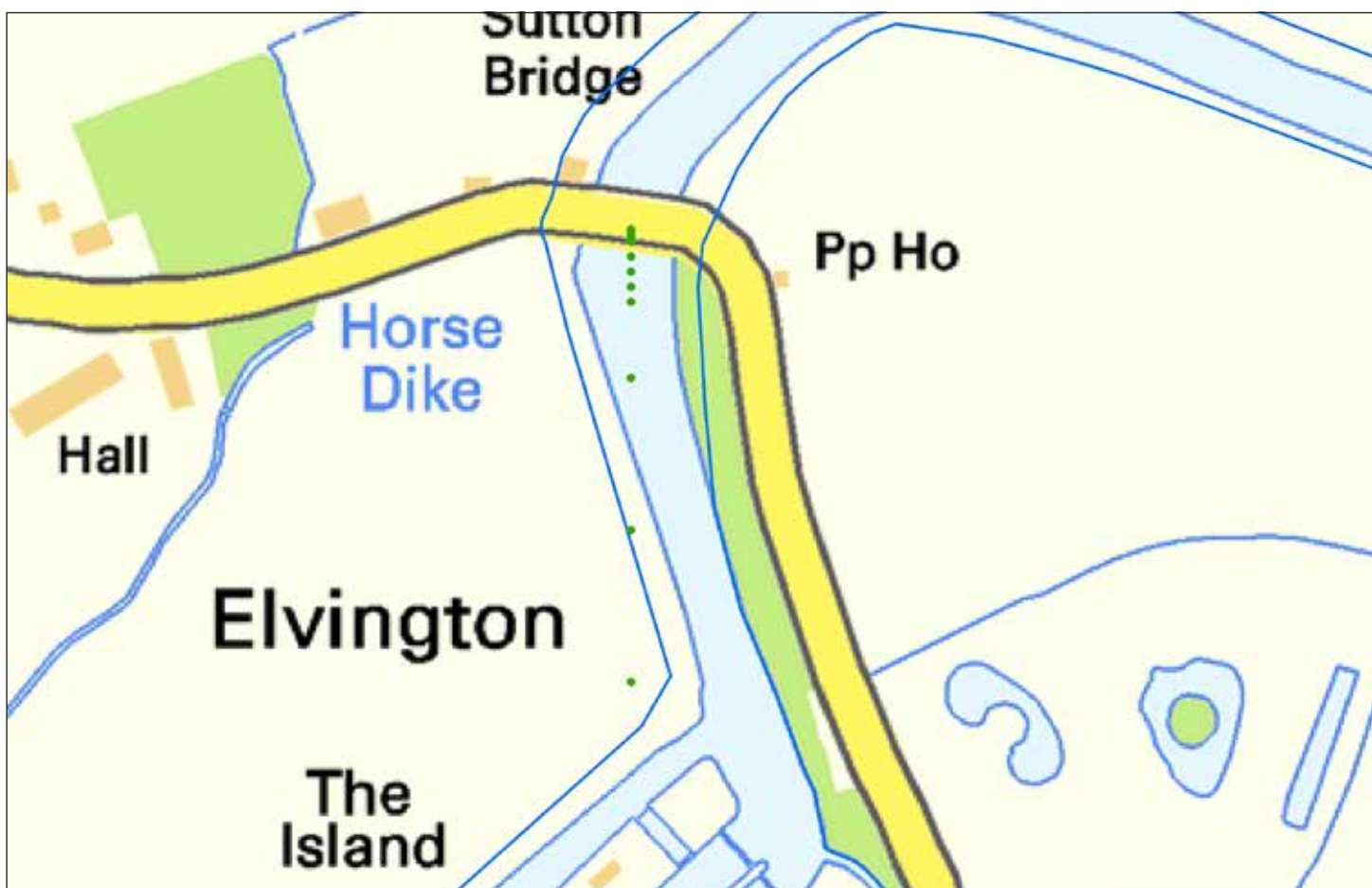
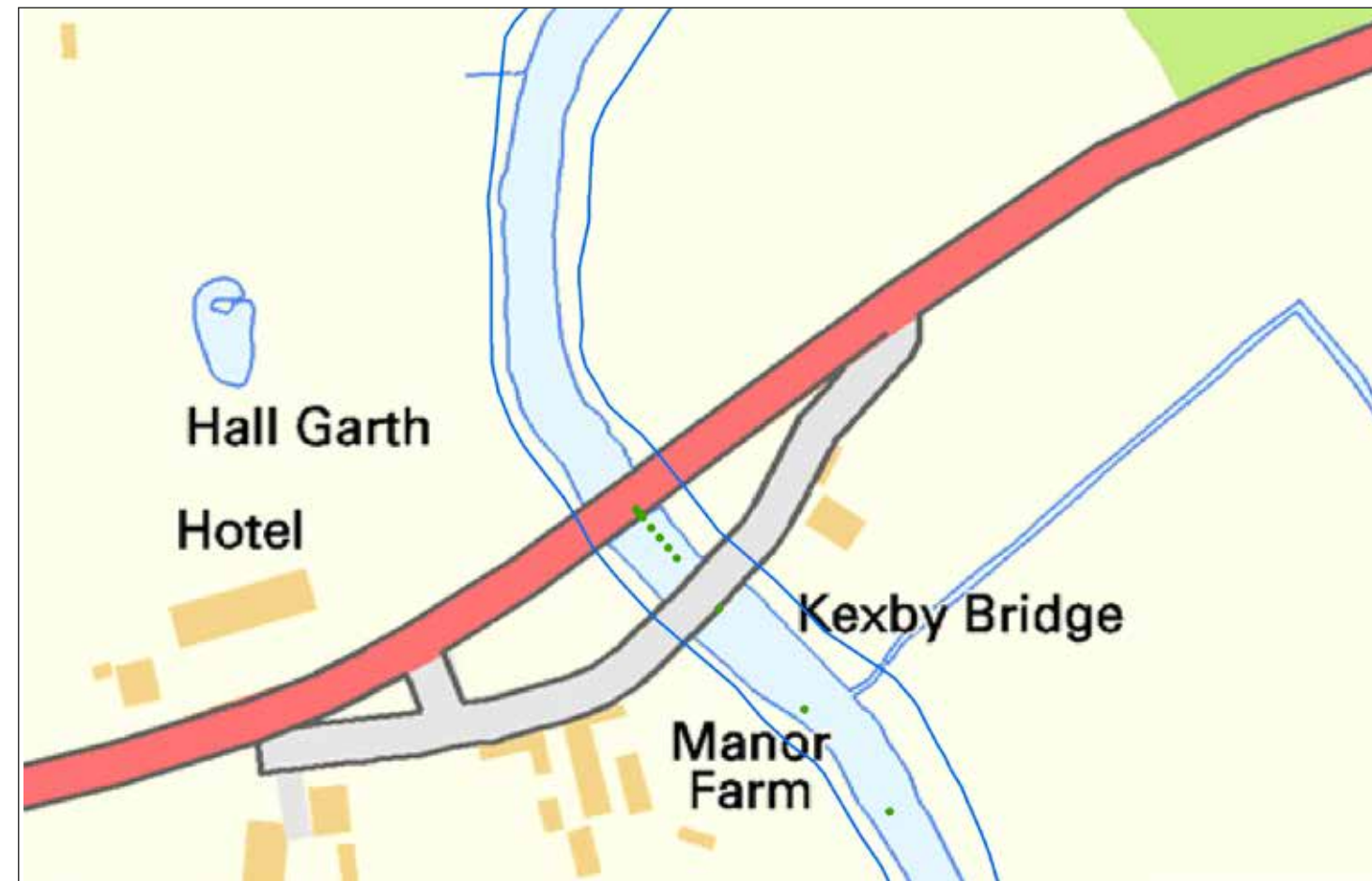
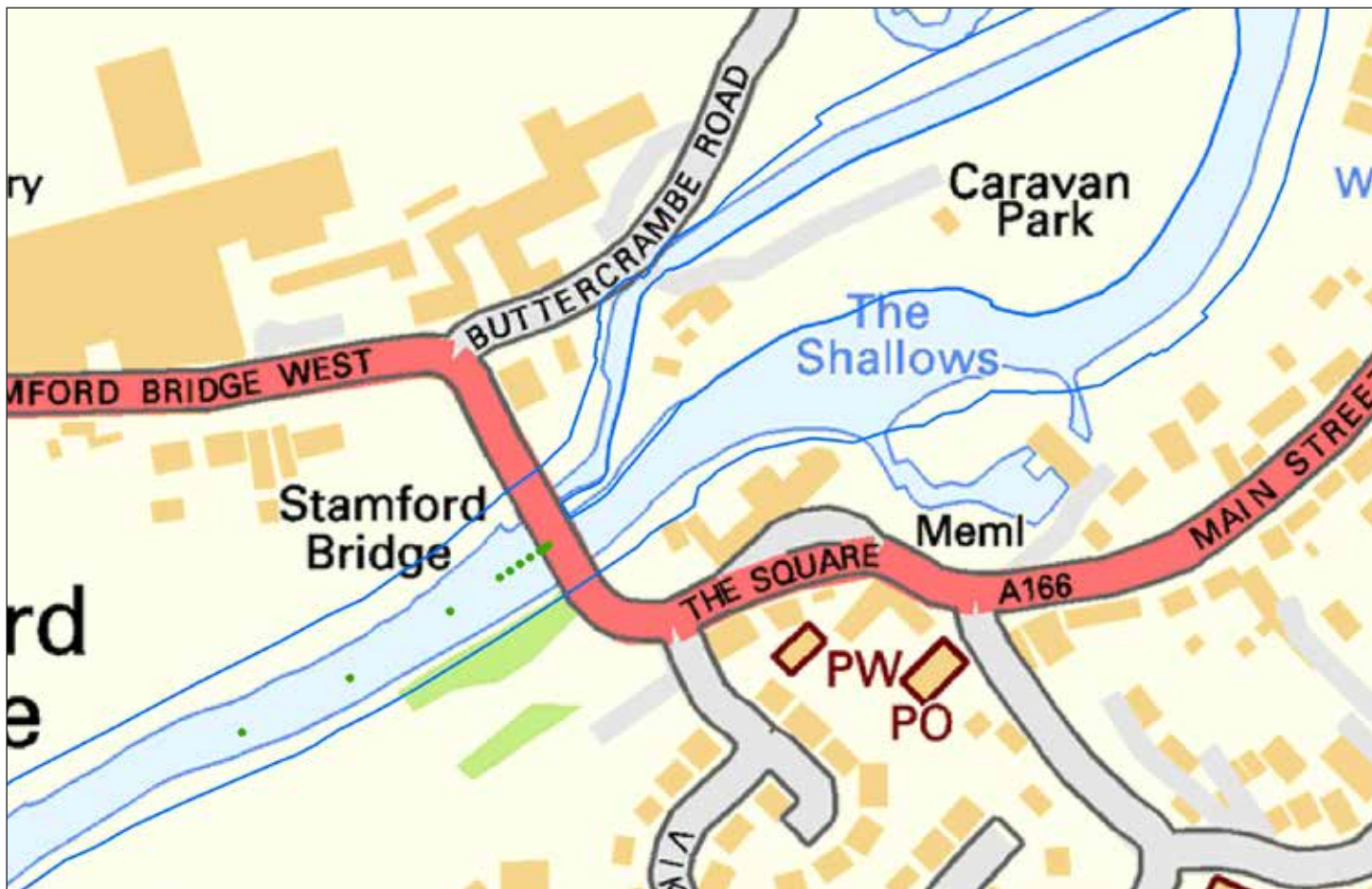
Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 5: Church Transect Location
Figure Ref	WIE13194-103_GR_AQ_5A
Date	April 2018
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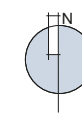
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Figure Title	Figure 6: Acaster South Ings Transect Location
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Date	April 2018
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Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 7: River Derwent Transect Locations
Figure Ref	WIE13194-103_GR_AQ_7A
Date	April 2018
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Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 8: Maximum Concentration Locations
Figure Ref	WIE13194-103_GR_AQ_8A
Date	April 2018
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## **APPENDICES**

**Appendix A**

**Air Quality Assessment Detailed Methodology**





## Appendix A: Air Quality Assessment Detailed Methodology

- 1.1 This appendix presents the technical information and data upon which the air quality assessment is based.

### ADMS-Roads

- 1.2 In urban areas, pollutant concentrations are primarily determined by the balance between pollutant emissions that increase concentrations, and the ability of the atmosphere to reduce and remove pollutants by dispersion, advection, reaction and deposition. An atmospheric dispersion model is used as a practical way to simulate these complex processes; which requires a range of input data, which can include pollutant emissions rates, meteorological data and local topographical information.
- 1.3 The potential effects of the Development on local air quality was assessed using the advanced atmospheric dispersion model ADMS-Roads, taking into account the contribution of emissions from forecast road-traffic on the local road network by the completion year (taken to be 2033).
- 1.4 The ADMS-Roads model is a comprehensive tool for investigating air pollution in relation to road networks. On review of the Site, and its surroundings, ADMS-Roads was considered appropriate for the assessment of the potential long and short-term effects of the Development on air quality. The model uses advanced algorithms for the height-dependence of wind speed, turbulence and stability to produce improved predictions of air pollutant concentrations. It can predict long-term and short-term concentrations, including percentile concentrations.
- 1.5 ADMS-Roads model is a formally validated model, developed in the United Kingdom (UK) by CERC (Cambridge Environmental Research Consultants). This includes comparisons with data from the UK's air quality Automatic Urban and Rural Network (AURN) and specific verification exercises using standard field, laboratory and numerical data sets. CERC is also involved in European programmes on model harmonisation and their models were compared favourably against other E.U and U.S. EPA systems. Further information in relation to this is available from the CERC website at [www.cerc.co.uk](http://www.cerc.co.uk).

### Traffic Data

- 1.6 Traffic flow data comprising Annual Average Daily Traffic (AADT) flows, traffic composition (% Heavy-Duty Vehicles (HDVs)) were used in the model as provided by City of York Council for the surrounding road network.
- 1.7 The City of York Transport Model has been developed using the Cube modelling platform. The Cube Platform uses Cube software to calculate the existing and future year travel demand (i.e. trip generation, distribution and mode choice), Cube Voyager is used to model the PT network (Bus and Rail), and the highway network is modelled in SATURN. The model is a WebTag compliant multimodal variable demand model.
- 1.8 The Model area is divided up into zones for the purposes of loading demand onto the network. In total, 352 zones have been defined, as follows:
- 223 zones in the simulation network representing York city centre and the area outside York city centre
  - 36 zones in a buffer network representing Yorkshire and the Humber Region
  - 4 buffer zones representing the rest of the UK outside of the Yorkshire and Humber Region



- 1.9 For the zones in the simulation area representing York city centre and the area outside York city centre bespoke trip generation (and mode share) rates were generated for each Local Plan allocation based on its location within 9 broader zoning areas. These trips were loaded onto the network from within its respective modelling zone. For trips originating outside of the of the simulation area , existing trip rates were 'growthed' using TEMPRO Growth factors. Trips were then assigned on the network using SATURN to calculate forecast future year traffic information such as vehicle flows and journey times, on the modelled highway network.
- 1.10 As the SATURN model is an assignment model, flows on individual links can go down if an alternative route becomes quicker due to highway improvements downstream (such as the A1237 junction improvements, for example). Another circumstance whereby flows on a link can reduce is if it becomes difficult to exit the link at some point downstream, due to increases in traffic on opposing turns, for example. Links with low traffic volumes, for example, Flaxton Road or Towthorpe Moor Lane, are generally more sensitive to these effects.
- 1.11 The transport modelling typically provided forecast future year traffic information (in this case for 2032/33) in the am and pm peak periods, whereas air quality modelling requires daily traffic flow information. However, conversion factors can be used to provide a useful estimate of the annual average daily flows (AADFs). These conversion factors are based on average flows as measured by automatic traffic counters.
- 1.12 To ensure the in-combination effect of neighboring authorities has been assessed, local traffic growth factors were applied to the future year flows to consider traffic growth and cumulative developments in the area. **Table A1** presents the traffic data used within the Air Quality Assessment.

Table A1: 24-hour AADT Data Used within the Assessment

Ecological Site	Link Name	Speed (kph)	Base 2016		Without 2033		With 2033	
			AADT	%HDV	AADT	%HDV	AADT	%HDV
Strensall Common	Strensall Road	46	11,709	6.0	12,786	6.0	14,353	6.0
	Flaxton Road	62	1,925	6.0	2,102	6.0	3,416	6.0
	A1237	45	27,378	4.0	29,897	4.0	40,267	4.0
Clifton Ings	Water End	37	18,839	6.0	18,839	6.0	19,823	6.0
Fulford Ings	Radway Green Road	44	17,544	6.0	19,965	6.0	22,429	6.0
Askham Bog	A64	98	53,662	6.0	61,067	6.0	64,015	6.0
	Tadcaster Road	62	9,133	6.0	10,393	6.0	10,501	6.0
Acaster South Ings	B1222	67	2734	6.0	2,734	6.0	2,709	6.0
Church Ings	B1222	67	2734	6.0	2,734	6.0	2,709	6.0
River Derwent	A166	59	11,573	5.6	12,927	5.6	12,746	5.6
	A1079	61	16,655	7.4	18,604	7.4	19,527	7.4
Lower Derwent	B1228	53	4,641	7.1	5,184	7.1	5,606	7.1

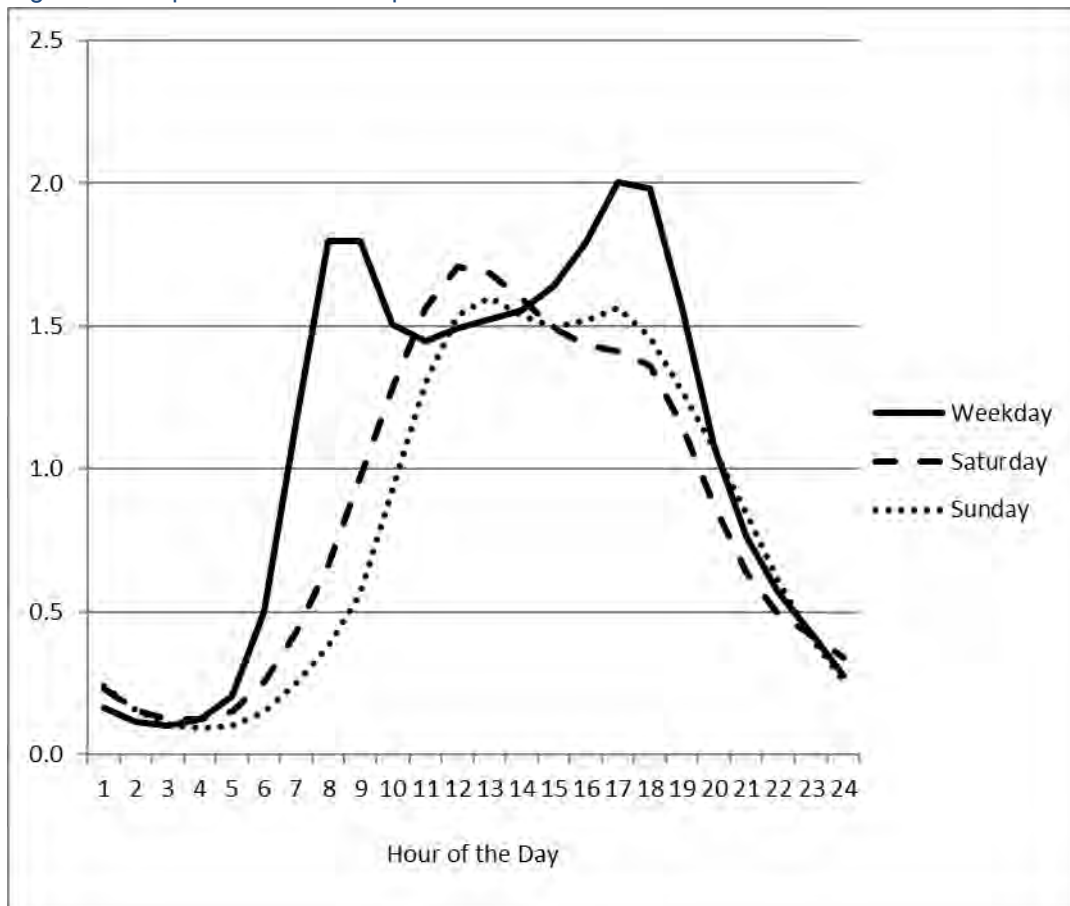




## Diurnal Profile

- 1.13 The ADMS-Roads model uses an hourly traffic flow based on the daily (AADT) flows. Traffic flows follow a diurnal variation throughout the day and week. Therefore, a diurnal profile was used in the model to replicate how the average hourly traffic flow would vary throughout the day and the week. This was based on data collated by Waterman from the Department for Transport (DfT) statistics Table TRA0307: 'Traffic Distribution by Time of Day on all roads in Great Britain', 2016<sup>1</sup>, which was used to be consistent with the traffic data used. **Figure A1** presents the diurnal variation in traffic flows which has been used within the model.

Figure A1: Department for Transport Diurnal Traffic Variation



## Meteorological Data

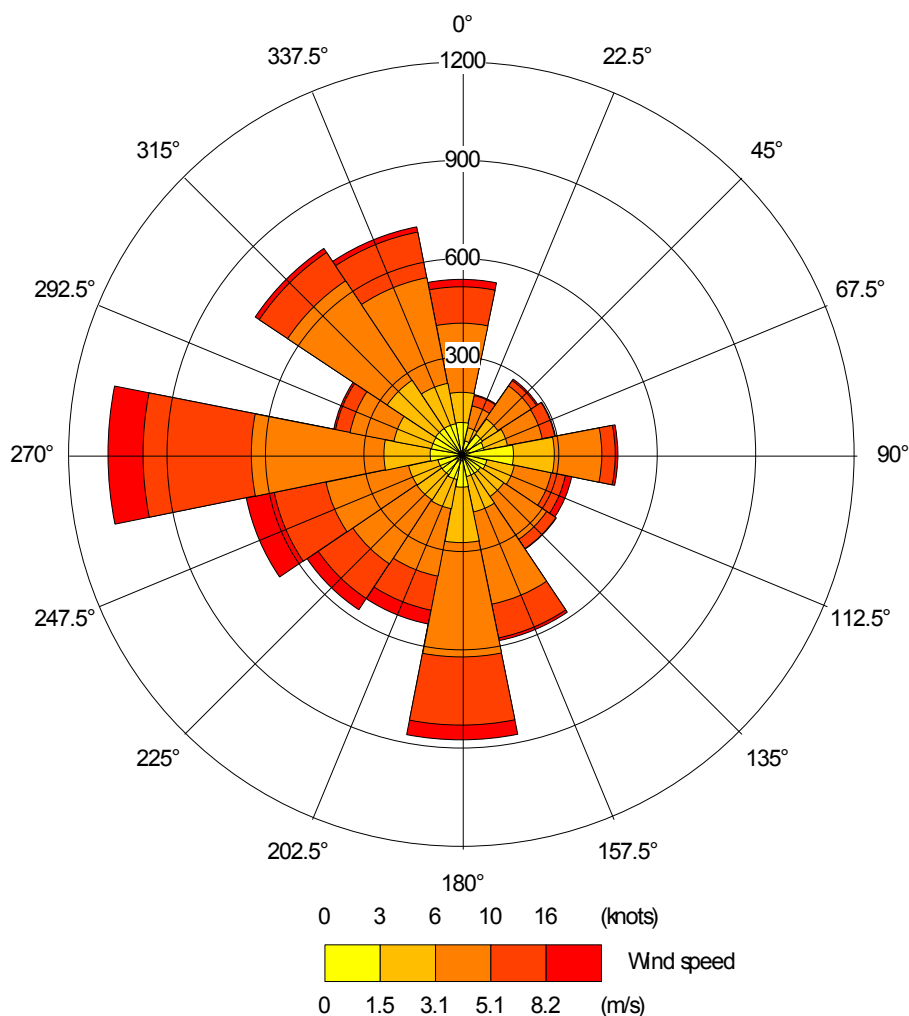
- 1.14 Local meteorological conditions strongly influence the dispersal of pollutants. Key meteorological data for dispersion modelling include hourly sequential data including wind direction, wind speed, temperature, precipitation and the extent of cloud cover for each hour of a given year. As a minimum ADMS-Roads requires wind speed, wind direction, and cloud cover.
- 1.15 Meteorological data to input into the model were obtained from the Linton on Ouse Airport Meteorological Station, which is the closest to the Site and considered to be the most representative. The 2016 data were used to be consistent with the base traffic year and model

<sup>1</sup> Department for Transport (DfT) Statistics, [www.dft.gov.uk/statistics/series/traffic](http://www.dft.gov.uk/statistics/series/traffic)



verification year. It was also used for the 2033 scenario for the air quality assessment. **Figure A2** presents the wind-rose for the meteorological data.

Figure A2: 2016 Wind Rose for the Linton on Ouse Airport Meteorological Site



- 1.16 Most dispersion models do not use meteorological data if they relate to calm winds conditions, as dispersion of air pollutants is more difficult to calculate in these circumstances. ADMS-Roads treats calm wind conditions by setting the minimum wind speed to 0.75 m/s. It is recommended in LAQM.TG(16) that the meteorological data file be tested within a dispersion model and the relevant output log file checked, to confirm the number of missing hours and calm hours that cannot be used by the dispersion model. This is important when considering predictions of high percentiles and the number of exceedances. LAQM.TG(16) recommends that meteorological data should only be used if the percentage of usable hours is greater than 85%. 2016 meteorological data from Linton on Ouse Airport includes 8,660 lines of usable hourly data out of the total 8,784 for the year, i.e. 98.6% of usable data. This is above the 85% threshold, and is therefore adequate for the dispersion modelling.



- 1.17 A value of 0.2 was used for the Linton on Ouse Airport Meteorological Station, which is representative of agricultural areas and is considered appropriate following a review of the local area surrounding the Meteorological Station.

### Model Data Processing

- 1.18 There are a number of other parameters that are used within the ADMS-Roads model which are described for completeness and transparency:
- The model requires a surface roughness value to be inputted.
    - A value of 0.5 was used for the Site, which is representative of parkland and open suburbia;
    - A value of 0.2 was used for the Linton on Ouse Airport Meteorological Station, which is representative of agricultural areas; and
  - The model requires the Monin-Obukhov length (a measure of the stability of the atmosphere) to be inputted. A value of 30m (representative of large towns) was used for the modelling; and

### Model Verification

- 1.19 Model verification is the process of comparing monitored and modelled pollutant concentrations for the same year, at the same locations, and adjusting modelled concentrations if necessary to be consistent with monitoring data. This increases the robustness of modelling results.
- 1.20 Discrepancies between modelled and measured concentrations can arise for a number of reasons, for example:
- Traffic data uncertainties;
  - Background concentration estimates;
  - Meteorological data uncertainties;
  - Sources not explicitly included within the model (e.g. car parks and bus stops);
  - Overall model limitations (e.g. treatment of roughness and meteorological data, treatment of speeds); and
  - Uncertainty in monitoring data, particularly diffusion tubes.
- 1.21 Box 7.15 in LAQM.TG(16) indicates a method based on comparison of the road NO<sub>x</sub> contributions and calculating an adjustment factor. This requires the roadside NO<sub>x</sub> contribution to be calculated. In addition, monitored NO<sub>x</sub> concentrations are required, which were calculated from the annual mean NO<sub>2</sub> concentration at the diffusion tube site using the NO<sub>x</sub> to NO<sub>2</sub> spreadsheet calculator as described above. The steps involved in the adjustment process are presented in **Table A2**.

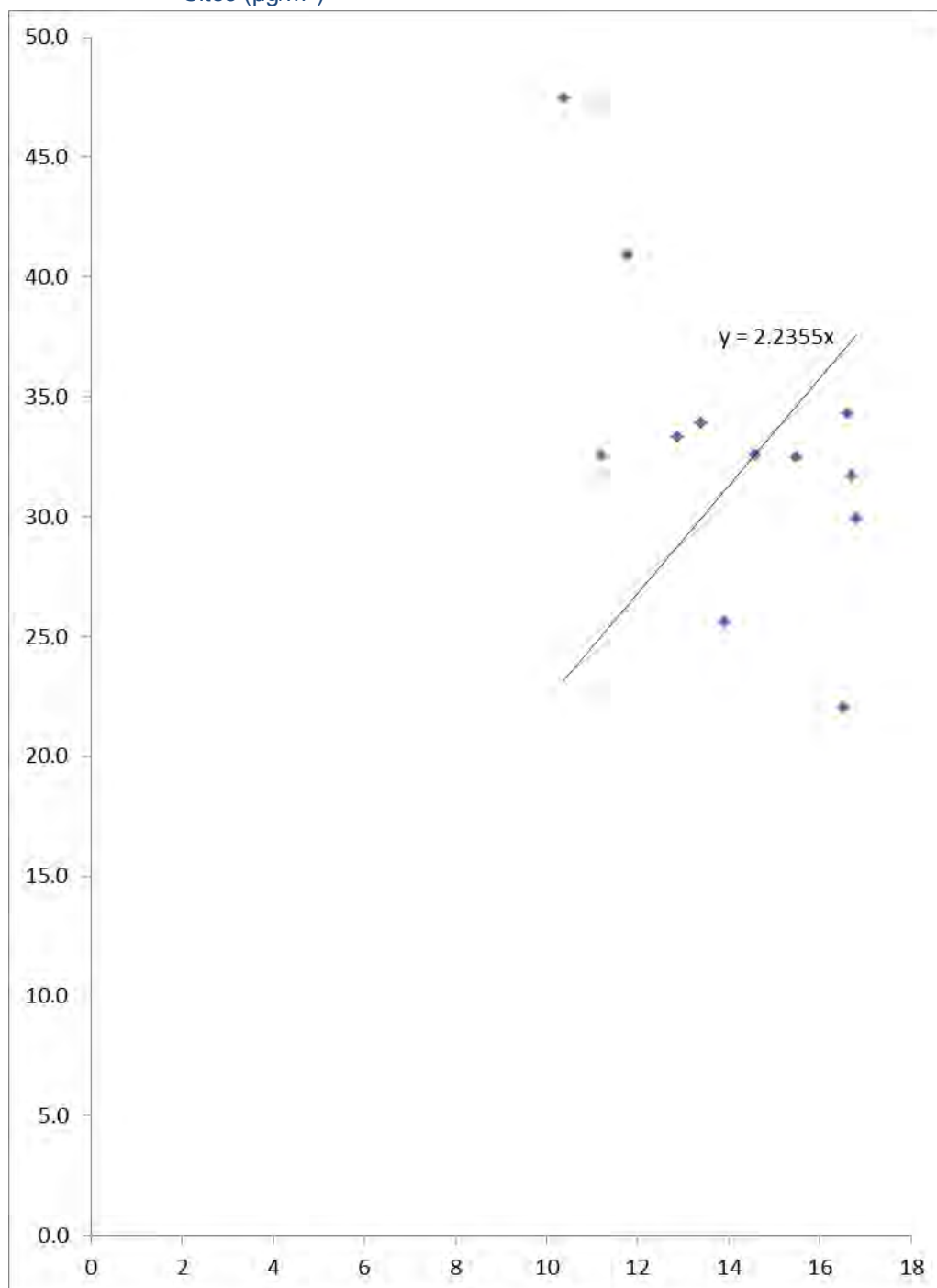
Table A2: Model Verification Result for Adjustment NO<sub>x</sub> Emissions (µg/m<sup>3</sup>)

Site ID	Monitored NO <sub>2</sub>	Monitored NO <sub>x</sub>	Monitored Road NO <sub>2</sub>	Monitored Road NO <sub>x</sub>	Modelled Road NO <sub>x</sub>	Ratio of Monitored Road Contribution NO <sub>x</sub> /Modelled Road Contribution NO <sub>x</sub>
47	28.3	48.7	16.9	33.3	12.9	2.6
A12	29.0	52.5	16.7	30.0	16.8	1.8
A96	31.7	54.2	16.2	32.5	15.5	2.1
C29	30.0	51.2	16.4	32.6	14.6	2.2
C30	30.8	52.9	17.2	34.3	16.6	2.1
C34	25.2	41.9	13.2	25.6	13.9	1.8
C36	28.5	48.9	16.5	32.6	11.2	2.9
C38	28.1	48.0	16.1	31.7	16.7	1.9
C39	32.6	57.7	20.3	41.0	11.8	3.5
C58	35.5	64.2	23.2	47.5	10.4	4.6
95a/b/c	23.7	38.7	11.4	22.0	16.5	1.3
C43/43a/44	29.4	50.7	17.1	34.0	13.4	2.5

- 1.22 Figure A3 shows the mathematical relationship between modelled and monitored roadside NO<sub>x</sub> (i.e. total NO<sub>x</sub> minus background NO<sub>x</sub>) in a scatter graph (data taken from Table A2), with a trendline passing through zero and its derived equation.



Figure A3: Unadjusted Modelled versus Monitored Annual Mean Roadside NO<sub>x</sub> at the Monitoring Sites (µg/m<sup>3</sup>)



1.23 Consequently, in **Table A11** the adjustment factor (2.2355) has been applied to the modelled NO<sub>x</sub> Roadside concentrations.

Table A3: Model Verification Result for Adjustment NO<sub>x</sub> Emissions (µg/m<sup>3</sup>)

Site ID	Adjusted Modelled Road NO <sub>x</sub>	Adjusted Modelled Total NO <sub>x</sub>	Modelled Total NO <sub>2</sub>	Monitored Total NO <sub>2</sub>	% Difference
47	26.6	42.1	25.1	28.3	-11.2
A12	34.8	53.9	31.2	29.0	7.7
A96	32.1	53.8	31.5	31.7	-0.6
C29	30.2	48.8	28.9	30.0	-3.8
C30	37.1	55.7	32.1	30.8	4.2
C34	28.8	45.1	26.7	25.2	6.0
C36	23.2	39.5	24.0	28.5	-15.8
C38	34.5	50.8	29.4	28.1	4.7
C39	24.4	41.1	24.9	32.6	-23.7
C58	21.4	38.1	23.4	35.5	-34.1
95a/b/c	34.2	50.9	29.5	23.7	24.5
C43/43a/44	27.7	44.4	26.5	29.4	-10.0

- 1.24 Based on the results from **Table A3**, the NO<sub>x</sub> adjustment process was applied to all roadside NO<sub>x</sub> modelling for 2016 and 2033 'without' and 'with' the Plan in place, at the specific receptor locations assessed.

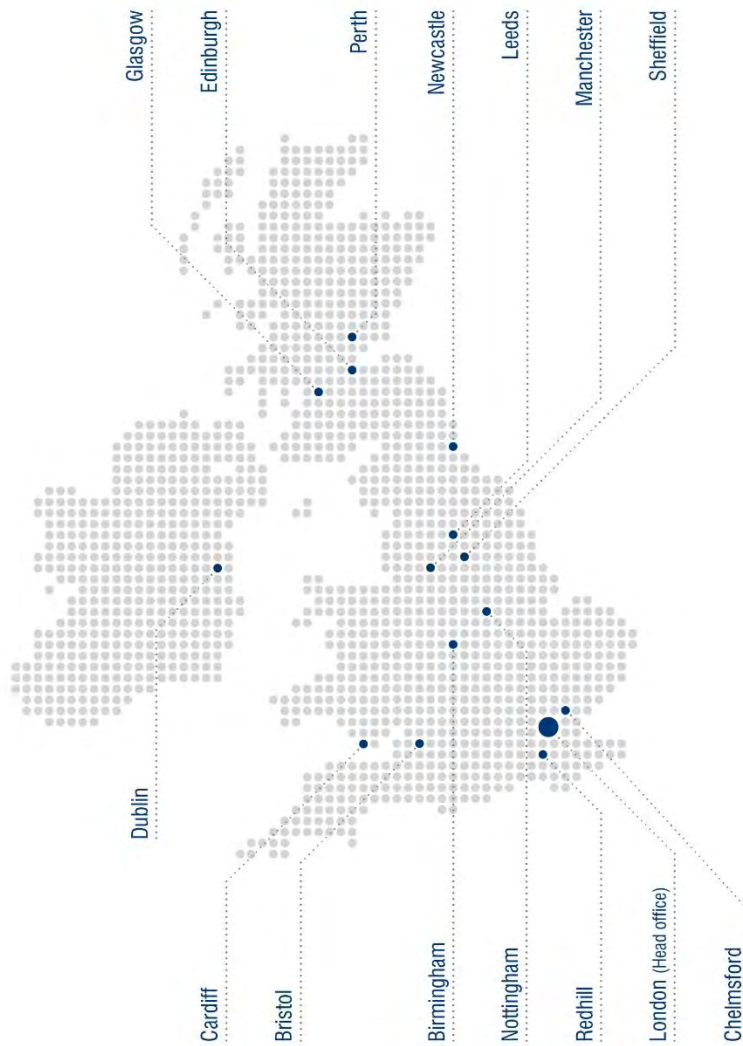
#### Verification Summary

- 1.25 Any atmospheric dispersion model study will always have a degree of inaccuracy due to a variety of factors. These include uncertainties in traffic emissions data, the differences between available meteorological data and the specific microclimate at each receptor location, and simplifications made in the model algorithms that describe the atmospheric dispersion and chemical processes. There will also be uncertainty in the comparison of predicted concentrations with monitored data, given the potential for errors and uncertainty in sampling methodology (technique, location, handling, and analysis) as well as processing of any monitoring data.
- 1.26 Whilst systematic under or over prediction can be taken in to account through the model verification / adjustment process, random errors will inevitably occur and a level of uncertainty will still exist in corrected / adjusted data.
- 1.27 Model uncertainties arise because of limited scientific knowledge, limited ability to assess the uncertainty of model inputs, for example, emissions from vehicles, poor understanding of the interaction between model and / or emissions inventory parameters, sampling and measurement error associated with monitoring sites and whether the model itself completely describes all the necessary atmospheric processes.
- 1.28 Overall, it is concluded that with the adjustment factors applied to the ADMS-Roads model, it is performing well and modelled results are considered to be suitable to determine the potential effects of the Development on local air quality.



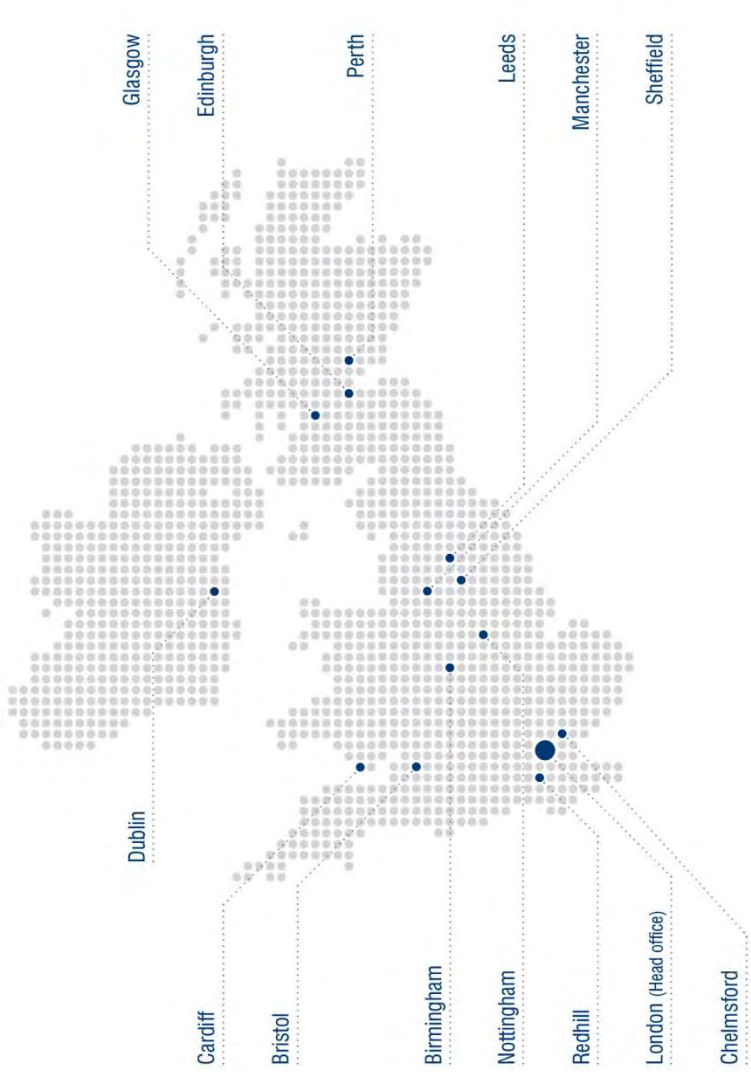


# UK and Ireland Office Locations





# UK and Ireland Office Locations



Date: 18 February 2019



Alison Cooke  
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West Offices  
Station Rise  
York  
YO1 6GA

Customer Services  
Hornbeam House  
Crewe Business Park  
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T 0300 060 3900

**BY EMAIL ONLY**

Dear Alison

### **Lower Derwent Valley SPA/SAC & Skipwith Common SAC and Strensall Common SAC Visitor Surveys**

Thank you for sharing the Visitor surveys for Lower Derwent Valley SPA/SAC & Skipwith Common SAC and Strensall Common SAC with Natural England. As requested at our meeting on 4 February 2019 our initial thoughts on these surveys are provided below.

#### **Lower Derwent valley SPA/SAC and Skipwith Common SAC**

The Visitor Survey for the Lower Derwent Valley and Skipwith suggests that additional visitor pressure resulting from housing allocations within the York Local Plan is unlikely to result in an adverse effect on integrity to the designated site. That said, Natural England's own observation and anecdotal information received does suggest that recreation pressure, particularly that arising from village communities adjacent to the site is a significant issue. This takes the form of dog walking, horse riding, cycling, wildfowling, boating etc. both within and adjacent to the designated site. Some of this access involves trespass into areas where there is no right of way. Unfortunately the visitor survey did not assess visitor pressure from key access area e.g. adjacent villages such as East Cottingham, Ellerton and Thorganby and consequently is likely to have under recorded recreational pressures.

#### **Strensall Common SAC**

The Visitor survey for Strensall very clearly identifies the high level of public use that Strensall Common SAC already receives. It also suggests a significant increase (24%) in access as a result of housing allocations within the draft Local Plan. A significant proportion of this increase is associated with allocations closer to the SAC (0-500m) with the ST 35 QEII allocation perhaps the most important contributor to this increase. Consequently the visitor survey concluded, "Given the scale of increase in access predicted from the visitor surveys, the proximity of new development and concerns relating to current impacts from recreation, adverse integrity on the SAC cannot be ruled out as a result of the quantum of development proposed. In addition, for individual allocations that are adjacent to the site it will be difficult to rule out adverse effects on integrity." Natural England concurs with this conclusion.

The visitor survey goes on to consider potential approaches to mitigation. The effectiveness of the various approaches are however caveated within the survey and from the information supplied, Natural England does not believe it is possible to rule out an adverse effect on the integrity of the Strensall Common SAC as a result of allocations currently included with the draft York Local Plan.

If you have any queries relating to the advice in this letter please contact me on 07717692927.

Yours sincerely

Lauren Forecast  
Yorkshire and northern Lincolnshire Team

## Local Plan Publication Draft - Proposed Modifications Schedule - 19<sup>th</sup> February 2019

Plan location	Proposed minor modification	Reason												
<b>Index of Policies, Figures and Tables</b>														
6 Pages in from Title Page	<table border="1"> <thead> <tr> <th>Policy Number</th> <th>Policy Name</th> <th>Page Number</th> </tr> </thead> <tbody> <tr> <td>Policy SS18</td> <td>Station Yard, Wheldrake</td> <td>62</td> </tr> <tr> <td><b>Policy SS19</b></td> <td><b>Queen Elizabeth Barracks Strensall</b></td> <td><b>63</b></td> </tr> <tr> <td>Policy SS20</td> <td>Imphal Barracks, Fulford Road</td> <td>67</td> </tr> </tbody> </table>	Policy Number	Policy Name	Page Number	Policy SS18	Station Yard, Wheldrake	62	<b>Policy SS19</b>	<b>Queen Elizabeth Barracks Strensall</b>	<b>63</b>	Policy SS20	Imphal Barracks, Fulford Road	67	Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35.
	Policy Number	Policy Name	Page Number											
	Policy SS18	Station Yard, Wheldrake	62											
	<b>Policy SS19</b>	<b>Queen Elizabeth Barracks Strensall</b>	<b>63</b>											
Policy SS20	Imphal Barracks, Fulford Road	67												
<b>Section 3: Spatial Strategy</b>														
Policy SS10: Land North of Monks Cross  Item No. X  Page 49	x. Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England, as necessary, to ensure sustainable transport provision at the site is achievable. The site will exacerbate congestion in the area, particularly at peak times given its scale and the capacity of the existing road network. The impacts of the site individually and cumulatively with sites ST7, ST9, <b>and</b> ST14 <b>and</b> <b>ST35</b> should be addressed.	Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan.												
Policy SS12: Land West of Wigginton Road  Item No. VII  Page 53	vii. Demonstrate that all transport issues have been addressed, in consultation with the Council as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with site's ST7, ST8, ST9, <b>and</b> ST15 <b>and</b> <b>ST35</b> should be addressed.	Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan.												
Policy SS13: Land West of Elvington Lane	xi. Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure sustainable transport provision at the	Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan.												

## Local Plan Publication Draft - Proposed Modifications Schedule - 19<sup>th</sup> February 2019

Item No. XI	site is achievable. The impacts of the site individually and cumulatively with site's ST7, ST8, ST9, ST14, ST27, <b>ST35</b> and ST36 should be addressed.										
Policy SS19: Queen Elizabeth Barracks, Strensall  Pages 63-65	Remove entire policy	Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).									
Policy SS19: Queen Elizabeth Barracks, Strensall  Explanation  Pages 65-67	Remove entire explanatory justification.										
<b>Section 4: Economy and Retail</b>											
Policy EC1: Employment Allocations  Allocation E18 and associated footnote  Page 76	<table border="1"> <thead> <tr> <th data-bbox="521 970 824 1050">Site</th> <th data-bbox="824 970 1032 1050">Floorspace</th> <th data-bbox="1032 970 1413 1050">Suitable Employment uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="521 1050 824 1177">E18: Towthorpe Lines, Strensall (4ha)*</td> <td data-bbox="824 1050 1032 1177">13,200sqm</td> <td data-bbox="1032 1050 1413 1177">B1c, B2 and B8 uses.</td> </tr> <tr> <td colspan="3" data-bbox="521 1177 1413 1394">* <del>Policy SS19 points i. – ii. apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and Given the site's proximity to Strensall Common SAC (see explanatory text), this site</del> must <del>also</del> take account of Policy GI2.</td> </tr> </tbody> </table>	Site	Floorspace	Suitable Employment uses	E18: Towthorpe Lines, Strensall (4ha)*	13,200sqm	B1c, B2 and B8 uses.	* <del>Policy SS19 points i. – ii. apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and Given the site's proximity to Strensall Common SAC (see explanatory text), this site</del> must <del>also</del> take account of Policy GI2.			Modification to associated footnote to refer to Policy GI2 (set out in CD003 - Modifications schedule to 25 <sup>th</sup> May 2018) following removal of policy SS19/ Site Allocation ST35.
Site	Floorspace	Suitable Employment uses									
E18: Towthorpe Lines, Strensall (4ha)*	13,200sqm	B1c, B2 and B8 uses.									
* <del>Policy SS19 points i. – ii. apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and Given the site's proximity to Strensall Common SAC (see explanatory text), this site</del> must <del>also</del> take account of Policy GI2.											



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<p>Policy EC1: Employment Allocations</p> <p>Explanatory text</p> <p>Page 77</p>	<p><b><u>The location of allocation E18 adjacent to Strensall Common SAC means that a comprehensive evidence base to understand the potential impacts on biodiversity from further development is required. Strensall Common is designated for it's heathland habitats but also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered. Although the common is already under intense recreational pressure, there are birds of conservation concern amongst other species and habitats which could be harmed by the intensification of disturbance. In addition, the heathland habitat is vulnerable to changes in the hydrological regime and air quality, which needs to be explored in detail. The mitigation hierarchy should be used to identify the measures required to first avoid impacts, then to mitigate unavoidable impacts or compensate for any unavoidable residual impacts, and be implemented in the masterplanning approach. Potential access points into the planned development also need to consider impacts on Strensall Common.</u></b></p>	<p>New explanatory text to ensure that allocation E18 is considered in relation to Strensall Common SAC.</p>										
<p><b>Section 5: Housing</b></p>												
<p>Policy H1: Housing Allocations</p> <p>Allocation H59 and associated footnote</p> <p>Page 93</p>	<table border="1"> <thead> <tr> <th data-bbox="524 1034 719 1145">Allocation Reference</th> <th data-bbox="719 1034 920 1145">Site Name</th> <th data-bbox="920 1034 1025 1145">Site Size (ha)</th> <th data-bbox="1025 1034 1227 1145">Estimated Yield (Dwellings)</th> <th data-bbox="1227 1034 1420 1145">Estimated Phasing</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 1145 719 1369">H59**/**</td> <td data-bbox="719 1145 920 1369">Queen Elizabeth Barracks – Howard Road, Strensall</td> <td data-bbox="920 1145 1025 1369">1.34</td> <td data-bbox="1025 1145 1227 1369">45</td> <td data-bbox="1227 1145 1420 1369">Medium to Long Term (Years 6-15)</td> </tr> </tbody> </table>	Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing	H59**/**	Queen Elizabeth Barracks – Howard Road, Strensall	1.34	45	Medium to Long Term (Years 6-15)	<p>Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).</p> <p>Removal of associated footnote (set out in CD003 - Modifications schedule to 25<sup>th</sup> May 2018) following removal of policy</p>
Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing								
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	<p><del>*** Policy SS19 points i. – ii. apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and must also take account of Policy G12.</del></p>	<p>SS19/ Site Allocation ST35.</p>										
<p>Policy H1: Housing Allocations  Allocation ST35  Page 94</p>	<table border="1"> <thead> <tr> <th>Allocation Reference</th> <th>Site Name</th> <th>Site Size (ha)</th> <th>Estimated Yield (Dwellings)</th> <th>Estimated Phasing</th> </tr> </thead> <tbody> <tr> <td><del>ST35** Queen Elizabeth</del></td> <td><del>Barracks, Strensall</del></td> <td><del>28.8</del></td> <td><del>500</del></td> <td><del>Medium to Long Term (Years 6-15)</del></td> </tr> </tbody> </table>	Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing	<del>ST35** Queen Elizabeth</del>	<del>Barracks, Strensall</del>	<del>28.8</del>	<del>500</del>	<del>Medium to Long Term (Years 6-15)</del>	<p>Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).</p>
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<p><b>Section 9: Green Infrastructure</b></p>												
<p>Policy G12: Biodiversity and Access to Nature  Page 166</p>	<p>In order to conserve and enhance York’s biodiversity, any development should where appropriate:</p> <p><b><u>i. determine if they are likely to have a significant effect on an International Site in the context of the statutory protection which is afforded to the site.</u></b></p> <p><b><u>ii. demonstrate that proposals will not have an adverse effect on a National Site (alone or in combination). Where adverse impacts occur, development will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of National Sites.</u></b></p> <p><b><u>iii. demonstrate that where loss or harm to a National site cannot be prevented or adequately mitigated,</u></b></p>	<p>Policy amended to include reference to internationally and nationally designated nature conservation sites and how they will be considered through the planning process following Natural England’s response to the Regulation 19 consultation.</p>										

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	<p><b><u>as a last resort, provide compensation for the loss/harm. Development will be refused if loss or significant harm cannot be prevented, adequately mitigated against or compensated for.</u></b></p> <p><b><u>i- iv.</u></b> avoid loss or significant harm to Sites of Importance for Nature Conservation (SINCs) <b><u>and Local Nature Reserves (LNRs)</u></b>, whether directly or indirectly. Where it can be demonstrated that there is a need for the development in that location and the benefit outweighs the loss or harm the impacts must be adequately mitigated against, or compensated for as a last resort;</p> <p><b><u>ii- v.</u></b> ensure the retention, enhancement and appropriate management of features of geological, or biological interest, and further the aims of the current Biodiversity Audit and Local Biodiversity Action Plan;</p> <p><b><u>iii- vi.</u></b> take account of the potential need for buffer zones around wildlife and biodiversity sites, to ensure the integrity of the site's interest is retained;</p> <p><b><u>iv- vii.</u></b> result in net gain to, and help to improve, biodiversity;</p> <p><b><u>v- viii.</u></b> enhance accessibility to York's biodiversity resource where this would not compromise their ecological value, affect sensitive sites or be detrimental to drainage systems;</p> <p><b><u>vi- ix.</u></b> maintain and enhance the rivers, banks, floodplains and settings of the Rivers Ouse, Derwent and Foss, and other smaller waterways for their biodiversity, cultural and historic landscapes, as well as recreational activities where this does not have a detrimental impact on the nature conservation value;</p> <p><b><u>vii- x.</u></b> maintain water quality in the River Ouse, River Foss and River Derwent to protect the aquatic environment, the interface between land and river, and continue to</p>	
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	<p>provide a viable route for migrating fish. New development within the catchments of these rivers will be permitted only where sufficient capacity is available at the appropriate wastewater treatment works. Where no wastewater disposal capacity exists, development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of the River Derwent, Lower Derwent Valley and Humber Estuary European Sites;</p> <p><b>viii.xi.</b> maintain and enhance the diversity of York's Strays for wildlife; and</p> <p><b>ix. xii.</b> ensure there is no detrimental impact to the environmental sensitivity and significant Lower Derwent Valley and its adjacent functionally connected land which whilst not designated, are ultimately important to the function of this important site.</p>	
<p>Policy GI6: New Open Space Provision</p> <p>Page 172</p>	<p>Indicative new significant areas of open space have been identified in connection with the following strategic sites, as shown on the proposals map:</p> <ul style="list-style-type: none"> <li>• OS7: Land at Minster Way at ST7</li> <li>• OS8: New Parkland to the East of ST8</li> <li>• OS9: New Recreation and Sports Provision to the south of ST9</li> <li>• OS10: New Area for Nature Conservation on land to the South of A64 in association with ST15</li> <li>• OS11: Land to the East of ST31</li> <li>• <del>OS12: Land to the East of ST35</del></li> </ul>	<p>Removal of indicative open space associated with Policy SS19 and allocations ST35/H59, which are removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).</p>

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<b>Section 14: Transport</b>		
Policy T7: Minimising and Accommodating Generated Trips  Page 225	See also Policy T1, SS4, SS9 to SS13, SS15, SS17, <del>SS19</del> , SS20, SS22 and ENV1	Reference to SS19 removed following removal of policy SS19/ Site Allocation ST35 from the plan..
<b>Section 15: Delivery and Monitoring</b>		
Table 15.2: Delivery and Monitoring  Section 3: Spatial Strategy  Page 243	- SS17: Hungate - SS18: Station Yard, Wheldrake - <del>SS19: Queen Elizabeth Barracks, Strensall</del> - SS20: Imphal Barracks, Fulford Road	Reference to SS19 removed following removal of policy SS19/ Site Allocation ST35 from the plan.
Table 15.2: Delivery and Monitoring  Section 9: Green Infrastructure  Page 255	New Target: <ul style="list-style-type: none"> <li>• <b><u>No adverse increase in recreational pressure on Strensall Common SAC, Lower Derwent Valley SPA and Skipwith Common SAC.</u></b></li> </ul> New indicator: <ul style="list-style-type: none"> <li>• <b><u>Change in visitor numbers at and condition of Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC</u></b></li> </ul>	Additional target and indicator to respond to requirements for monitoring and review of recreational pressure at European designated nature conservation sites as a result of development in the plan.

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