



COMMENTS FROM THE YORKSHIRE WILDLIFE TRUST ON PLAN SELBY FURTHER DRAFT STUDIES.

Overall comments

There has not been time to assess all the documents in detail. However comments below could also apply to other studies such as the Employment Land review as the same issues will be relevant. For example employment land allocated at North Duffield combined with housing sites will have high potential to negatively impact on European wildlife sites.

Duty to cooperate, the following 3 issues are likely to require cooperation with neighbouring authorities:

Flood risk cooperation:

There could be a benefit in ensuring that flood risk is discussed with LAs upstream of Selby. For example discussions with Ryedale for the River Derwent to promote flood storage and slowing runoff into the main rivers. This type of cross boundary cooperation could lead to reduced flood risk in Selby District.

Lower Derwent Valley Plan

Another part of the background information on biodiversity and wildlife sites in Selby District is the Lower Derwent Valley Plan which is in a draft form at the moment. The plan will be a vital part of the Duty to Cooperate between Selby and the authorities in York and the East Riding of Yorkshire. Sites which may have impacts on European sites will need to be either not allocated or considered very carefully before allocation.

Ecological Network Mapping:

Updating of the data for the Sites of Importance for Nature Conservation (SINC) and mapping ecological networks areas across the District would enable a more detailed assessment of the Plan on biodiversity. This background information needs to be an integral part of the assessment of the impacts of development on the biodiversity of the district.

Paragraph 117 of the NPPF states:

"117. To minimise impacts on biodiversity and geodiversity, planning policies should:

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*
- *aim to prevent harm to geological conservation interests; and*



- where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.”

Comments on the Draft Framework for Site Selection

Q9 (SS): Do you have any comments on:

- a. The overall approach to the site selection process set out in section 6.3 of the study? Page 20 where details of the initial sift are give sites will be eliminated if:
“International and National Environmental Designations: *The site is fully within an International or national designation sites including:”*
Sites within the Lower Derwent Valley (LDV) plan buffer zone, or adjacent to international site should also be eliminated in the initial sift. If sites are likely to have a significant impact on the integrity of the international site or will have a significant impact as part of a cumulative impact of a number of sites it would be preferable to scope them out at an early stage.

- b. The details of the site assessment work proposed in Appendix A of the study?

The following comments refer to headings in the table.

Accessibility by cycling:

Selby has excellent potential to increase cycling with national routes passing through plus the area is generally flat. There is a need to consider connectivity to the wider cycle network, traffic calming, safe routes to schools, and attractive routes and pinch points, grade separation etc. This will require qualitative assessment not just a desk based GIS assessment.

Impact on nationally and internationally protected sites (SSSI, SPA and SAC):

There may need to be a more nuanced approach in the LDV as there are some areas which are functionally connected to the European sites as they are crucial pieces of habitat during flood events for Schedule 1 birds. The mapping in the LDV plan will help to clarify this but a traffic light approach in the assessment may not be sufficiently detailed. The authority could then run into problems if the site cannot in fact be developed in the future. The number of sites involved will not be large although North Duffield could be particularly affected.

Biodiversity and Geological Value:

It will be important that data is up to date and that there are recent surveys for SINC. What ecological support will the LA have? Robust assessments will be necessary otherwise the data will not be sufficient if the LA is taken to a public inquiry. There is also a need for mapping of ecological networks, see next section.

Wildlife and Natural Environment:



There will be a need for biodiversity mapping within the local plan and this will then link to site allocations as well as an update on SINC. Policies to ensure high quality Green Infrastructure and links to surrounding habitat will then be required if there are allocations in biodiversity opportunity areas.

Comments on the Draft Growth Options for Designated Service Villages

Q10 (DSV): Appendix B of the study provides a Settlement Profile for each Designated Service Village, including environmental and heritage designations. Is there any information that is incorrect or missing from these Settlement Profiles summaries? (Please note, we are in the process of updating evidence such as flood risk, accessibility, landscape and green infrastructure)

When the flood risk evidence has been updated it will be important to consider reducing the number of allocations in areas in danger of flooding. Selby already has many settlements at risk from flooding and the allocation of sites should not lead to an increase in such settlements. For example Cawood is extremely vulnerable to flooding and increasing housing numbers there does not appear to be a sustainable option.

Q11 (DSV): If you had the choice, let us know which option for growth of the Designated Service Villages you would choose?

None of the suggested options would have a valuable outcome for biodiversity. The Trust would recommend Option 2 with an inclusion of the impact on biodiversity as one of the ways of determining growth. The option would then be "Option 2: Distribution based on services, accessibility and impact on biodiversity". Distance of the centre of the settlement from International, National and local sites could be used as a way of determining this.

All the sustainability assessments of the options have a number of unknown outcomes. In each case the impact on "13. A bio-diverse and attractive natural environment" is unknown. As mentioned above the Trust would expect more updated background information to be used to assess the impact on biodiversity.

Q12 (DSV): Are there any better ways/options of determining how many new dwellings should be built in each of the Designated Service Villages up to 2027

See above.

Q13 (DSV): What areas of open land in and around your village do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)



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The Trust would expect a more detailed assessment in many cases of the biodiversity value of areas around the Designated Service Villages. The assessments would be improved if there was more detail as to what distances from the settlements have been used in the assessment. There is also no differentiation between the importance of local, national and international sites which are close to the villages. Some of the sites will be more likely than others to be negatively impacted by development, issues such as disturbance will have a much greater impact on some sites than others. For example areas of the LDV designated for their importance for birds will be very sensitive to disturbance.

I hope this will be useful do get in touch if clarification is required.

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