



Yorkshire Wildlife Trust



Helen Gregory,
Selby District Council,
Civic Centre,
Doncaster Road,
Selby,
North Yorkshire
YO8 9FT.

18th July 2012

Subject: The 6th set of Proposed Changes to the Submission Draft Core Strategy

Dear Helen,

Thank you for consulting the Yorkshire Wildlife Trust on the above. The Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing 92 reserves and with a membership of over 33,500. The YWT is the second oldest of the 47 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

Overall, we are of the opinion that the proposed changes to the Draft Core Strategy are broadly in line with, and appropriate to the planning intentions of the NPPF. We wish to make the following comments on these particular proposed changes:

Chapter 1 (proposed change number PC6.4) – *Add text in Chapter 1 to incorporate explanation about new planning system and Localism Act 2011.*

In addition to socio-economic implications under the new planning system, it would be worthwhile to also explain how the District Council can work with communities to achieve gains for biodiversity and the natural environment under this planning system and the Localism Act 2011. In the planning section of the Trust's website there is a document on Localism and how to incorporate biodiversity information into Neighbourhood Plans see <http://www.ywt.org.uk/sites/yorkshire.live.wt.precedenthost.co.uk/files/Planning%20Leaflets%20draft%20-%20Neighbourhood%20plans.pdf>

Chapter 2 (proposed change number PC6.11) – *Add text to beginning of Chapter 2 to explain how strategic matters and cross boundary issues have been addressed within the Core Strategy as set out in Appendix 2.*

This is a particularly important addition to comply with the 'duty to cooperate' paragraphs 178-181 of the NPPF. This duty has been primarily seen by local authorities and business leaders as achieving strategic priorities from a socio-economic viewpoint. We believe that the duty to cooperate has also significant potential to successfully plan for biodiversity at a landscape-scale across local authority boundaries, as described in paragraph 117 of the NPPF. In this regard, the Yorkshire Wildlife Trust is advocating "Living Landscapes" across Yorkshire for the promotion, restoration and re-creation of priority habitats and ecological networks. The duty to cooperate mechanism has a key role to



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1 St. George's Place,
York, YO24 1GN
T 01904 659570
F 01904 613467
E info@ywt.org.uk
VAT No. 170 9214 75



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implement Green Infrastructure initiatives, particularly in the absence of Regional Strategies in England, and this could be highlighted further within this section. The fact that the European designated site, the Lower Derwent Valley is on the border of Selby District, City of York Council, and East Riding of Yorkshire Council makes this issue even more relevant and important.

Chapter 3 (proposed change number PC6.13) - *Add to the end of Objective 7 "giving preference to land of lesser environmental value"*

We agree that in the promotion of the efficient use of land, preference should be given to land of lesser environmental value. It is important to emphasise here that previously developed land may have a high biodiversity value, despite being designated as a "Brownfield" site. Such environmental value can be often overlooked when compared to Greenfield sites.

Chapter 3 (proposed change number PC6.15) – *Add reference to "protecting natural resources including safeguarding known locations of minerals resources"*

This is a welcome reference. Inappropriately planned development has often inhibited the future extraction possibilities of mineral resources, particularly with the increased pressure on land use in England. Safeguarding policy should help ensure that the planning system in Selby retains the flexibility to identify sites which have the least impact on the environment, as outlined in paragraphs 142-149 of the NPPF.

CP9 (proposed change number PC6.72) – *Insert two new paragraphs into paragraph 6.25*

We support the intention within these paragraphs to maintain the viability of rural communities so as to reduce the need to travel for economic and social services that can be accommodated in a local rural environment. It is important to recognise that different policies and measures will be required in different communities throughout Selby, and also the opportunities to maximise sustainable rural transport solutions will vary depending on the degree of urbanity of particular areas. This is outlined further in Section 29 (Chapter 4 – Promoting sustainable transport) of the NPPF.

CP9 (proposed change number PC6.73) – *Insert new paragraphs below paragraph 6.31*

These new paragraphs state that employment development outside the Designated Service Villages will be carefully assessed against development management, environmental and highways criteria. Regarding environmental criteria, the benefits of the local natural environment can be worked with to encourage sustainable employment opportunities, such as rural tourism and leisure developments. The character of the local countryside can then be of economic benefit but also respected (NPPF – Section 28).

CP12 (proposed change number PC6.81) – *Add new criterion to part A*

The new criterion makes reference to ensuring development proposals respond to land characteristics to minimise risks of erosion, subsidence and instability, and to exploit opportunities for reclamation and reinstatement of contaminated land. This is to correspond to paragraph 120 of the NPPF. The NPPF also refers to the need to take



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cumulative effects of pollution into account, whether on health, the natural environment or general amenity. We would recommend that this additional paragraph discusses measures to reduce such cumulative impacts of numerous developments over time within certain areas of the District.

CP14 (proposed change number PC6.83) – Amend 7.56

This discusses the appropriateness of identifying suitable areas for renewable and low carbon sources based on further evidence. It would be also very useful in this paragraph or elsewhere to state the District Council’s current position on hydraulic fracturing/fracking techniques used to release natural gas, petroleum and other substances for extraction. There has been considerable interest in the technique by its proponents in northern England, including in Yorkshire. Detractors of the practice point to potentially serious environmental impacts, including contamination of ground water and risks to air quality. We would be therefore very interested to note the present perspective of the District Council on this potential energy source. Recent Petroleum Exploration and Development licences have been granted by DECC in Yorkshire see <http://og.decc.gov.uk/assets/og/data-maps/maps/landfields-lics.pdf> and it may be advisable for the authority to have policies in place before planning applications are put in to develop potential reserves.

CP15 – (proposed change PC6.88) – Add “areas of tranquillity, public rights of way and access,” after ‘locally distinctive landscapes’ in criterion 5.

In addition, local distinctive landscapes should be seen as a significant part in the development of Green Infrastructure networks in Selby and beyond its borders to help biodiversity adapt to climate changes and development pressures. The Wildlife Trusts nationally with the RTPI have recently released a document on Green Infrastructure and biodiversity which may be very useful for the council in developing their GI strategy so that biodiversity is incorporated as suggested by the NPPF, the document can be downloaded from our website <http://www.ywt.org.uk/news/2012/07/10/planning-healthy-and-natural-environment>.

We hope these comments are useful to you, and please get in touch if any clarification is required.

Yours sincerely,

Sara Robin

Conservation Officer (Planning)
Yorkshire Wildlife Trust
Telephone: 01904 659570
Email: sara.robin@ywt.org.uk



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