

OPD/3

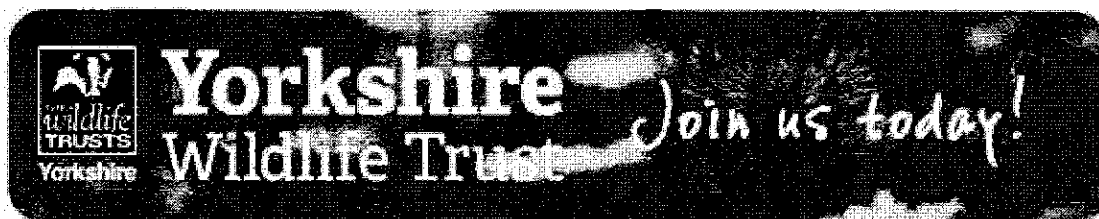
ryan king

From: Sara Robin [sara.robins@ywt.org.uk]
Sent: 02 August 2012 16:44
To: ldf
Cc: 'David Cole'; 'consultations@naturalengland.org.uk'
Subject: Olympia Park draft SPD
Follow Up Flag: Follow up
Flag Status: Completed
Attachments: 120802 Olympia Park SPD comments SVR.pdf

Attached is a comment on the above. I have included previous letters on the planning application for the site as two appendices as they contain a number of relevant points.

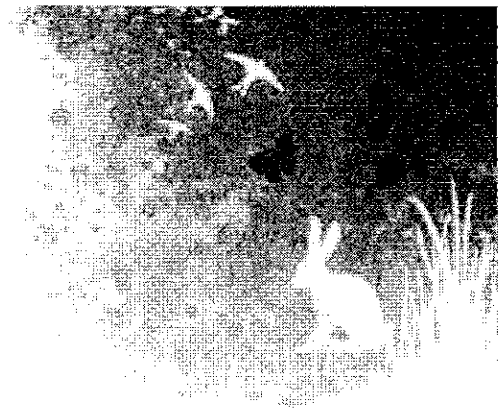
Yours

Sara Robin
Conservation Officer(Planning)
Yorkshire Wildlife Trust
Tel: 01904 659570
Email: sara.robins@ywt.org.uk
Website: www.ywt.org.uk



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Registered Charity Number 210807. Registered Office: 1 St George's Place, York, YO24 1GN.

OPD/R



Yorkshire
Wildlife Trust

Policy and Strategy Team,
Selby District Council,
Civic Centre,
Doncaster Road,
Selby YO8 9FT.

2nd August 2012

Dear Sir/Madam,

Comments on the Olympia Park Consultation Draft Supplementary Planning Document (SPD) and associated Olympia Park Framework Delivery Document and Master Plan.

Thank you for consulting the Yorkshire Wildlife Trust on the above documents. 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.

The production of an SPD after a major planning application has come in for the site does present some difficulty as to which comments which have already been made on the planning application and the scoping for it are also relevant to the SPD. The masterplan provided for the SPD consultation and the Draft Framework and Delivery Document are also part of the planning application for the site, which does suggest that the council may not have taken a distanced view of the development potential of the site. As a number of the comments in my letters of 22nd February and 11th July responding to the BOCM Olympia Park scoping and planning application respectively are relevant to the consultation, they are included as Appendix 1 and Appendix 2.

We recognise the intention to develop this site to create a sustainable urban extension to Selby town, combined with the regeneration of former industrial land and premises. We also recognise that this site was chosen as it is considered to be the most sustainable option because of its good relationship with the existing pattern of development, its accessibility to the highway network and public transport, and because it is part brownfield.

Transport and access to the site are mentioned in a number of different sections of the SPD. It will be very important that a transport plan for the site is developed for all parts of the site, and all types of transport. There is a danger that without joined up design that the development will generate a very great amount of extra traffic. For example it is proposed at 4.2.5 and 4.2.6 that in order to open up the Selby Farms site for employment as quickly as possible that access should be off the A63 Selby bypass. However access to the site by cycle or walking for residents of Selby would be quicker and more convenient along Recreation Road and the Trans Pennine cycle route. Commuters are far more likely to use cycles or walk if their route is faster and more convenient than using a car. Incorporating through routes for sustainable transport from the earliest planning stages is vital rather than seeing cycle and pedestrian routes as something which is added into the housing areas of the site at the final stages. In my response to the scoping for the Olympia park development I made a number of other comments on sustainable transport which are relevant see Appendix 2.



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Yorkshire Wildlife Trust is registered in England No. 415556 and is a registered charity No. 210007

1 St. George's Place,
York, YO1 1GN
T 01904 659570
F 01904 613467
E info@ywt.org.uk

VAT No. 776 964 75



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In 4.6.4 of the Supplementary Planning Document, it states that the completion of modern flood defences for Selby and Barlby has eliminated the risk of over topping of defences. However, within section 4.6.5, there is an acknowledgement that there remains a risk of flooding through a breach of defences. We therefore welcome the introduction of surface water management including SuDS. We would advocate the use of attenuation areas to reduce the risk of flooding downstream where such modern flood defences are in place. There are further comments on this in my previous letter at Appendix 2.

The Yorkshire Wildlife Trust is supportive of the policy at 4.9 and is in agreement with many of the proposals for SuDS schemes and Green Infrastructure. The Trust would be happy to be involved with plans to enhance the area for wildlife. There are however concerns about protected species present on the site which are dealt with in some detail in my letter at Appendix 1.

Do 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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Appendix 1.

Jo O'Sullivan
Access Selby
Market Cross Shopping Centre
Selby
North Yorks
YO8 4JS

22nd February 2012
Your ref: SCO/2011/0003

Dear Jo

Scoping opinion for a mixed use development at Olympia Park

Thank you for asking the Yorkshire Wildlife Trust for an opinion on the above. The Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing eighty reserves and with a membership of over 33,000. 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.

The Trust would like to record some brief comments:

Biodiversity Issues:

- PPS9 and the emerging Countryside Management Strategy for Selby mean that the development should not lock out opportunities for wildlife to move through the area. The development is next to a regionally important biodiversity corridor, the River Ouse and design of the development should ensure that opportunities to connect up habitat are taken and not locked out for the future. The proposals should include a spatial plan and strategy which identifies Green Infrastructure and biodiversity rich habitat both on and off site as well as a mechanism that secures the long term management of the site. Enclosed with this response is a document showing regional biodiversity enhancement areas developed by Natural England.
- Green Infrastructure (GI) needs to be designed into the development from the initial stages. GI will help to mitigate to some extent for lost habitat, can help to reduce the rainwater runoff from the site, and will create a development which will increase the health and wellbeing of the inhabitants. GI can also connect up to the wider area, for example the Ouse corridor and the Yorkshire Wildlife Trust's Living Landscape see <http://www.ywt.org.uk/what-we-do/living-landscapes>, enabling the movement of wildlife through the landscape.
- The Trust is pleased to see that the bat roosts that the Trust had been informed of have been identified and assessed and mitigation will be put in place. Issues such as lighting plans and foraging habitat should also be considered.



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- Features such as swift and swallow nest sites and bat roosts incorporated as part of the public buildings could be very valuable.
- Water vole will need habitat connectivity in order that populations do not get isolated within the development. Thought should be given to enhancing and connecting ditches within the site.
- The provision of Sustainable Urban Drainage Systems (SUDS) such as swales and ponds could give opportunities for enhancing biodiversity within the site.

Open spaces within the site:

- The Trust is pleased to see that replacement allotments will be provided within the development and would expect the replacement area to be at least as large as the present allotment area. Design of the new allotments area to minimise vandalism and increase take up of plots will be important so that the benefit to the community will be maximised. The Allotment Regeneration Initiative has a wealth of information on planning and maintaining allotment sites see <http://www.farmgarden.org.uk/ari/home>

Transport issues:

- Given the position of the site very close to the Sustrans route national route 65 and the Trans Pennine Trail there are excellent opportunities to design in cycle route connectivity from the very earliest planning stages so that using alternatives to the car are more convenient than private car use. The Trust would recommend that to go some way towards minimising motorised traffic generation and encouraging sustainable transport that best practise should be followed throughout the development in designing cycle routes. Sustrans will be able to advise on ensuring connectivity to the national route <http://www.sustrans.org.uk/> and <http://www.sustrans.org.uk/resources/design-and-construction/documents-and-drawings/reference-documents> also government design guidelines can be found at <http://www2.dft.gov.uk/pgr/roads/tpm/ltnotes/ltn208.pdf> . Ensuring that such a large development is designed for pedestrians and cyclists could be very helpful in encouraging sustainable forms of transport and improving air quality in Selby. Cycle routes need to be direct and fast, designing routes which are indirect without priority for cyclists and with many road crossings will deter cyclists. The cycle route on Barlby Road will need to be designed correctly so that it is well used. Shared pedestrian and cycle routes can create conflict and be dangerous for vulnerable pedestrians if not well designed with adequate space for both groups of users.
- The extensive use of roundabouts in the design of the development may be a disincentive to cycling and pedestrian movements, a document on cyclists and roundabouts from Nottinghamshire Council is included with this response. The Trust would recommend that as well as monitoring any effects on the road network of Selby from traffic generated by the development that monitoring of cycle trips is also carried out. City of York Council may be able to help with this as a great deal of remote monitoring was carried out for the Cycling City York project which has just been completed [http://democracy.york.gov.uk/\(S\(1bmhv255bhsqbn34bd5sco55\)\)/mgIssueHistoryHome.aspx?IId=27790](http://democracy.york.gov.uk/(S(1bmhv255bhsqbn34bd5sco55))/mgIssueHistoryHome.aspx?IId=27790) Graham Tichener who was the project officer and who is now employed on another transport related project would be the best contact for further information graham.titchener@york.gov.uk.
- By ensuring there are safe routes to the school from the design stage pupils are more likely to walk and cycle to school see <http://www.sustrans.org.uk/what-we-do/safe-routes-to-schools> .



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Potential for Green Roofs:

- Green roofs could be provided on some of the buildings. This can reduce the speed of rainwater runoff and provide habitat for some wildlife. There are a number of very successful green roofs on buildings in Sheffield see <http://www.thegreenroofcentre.co.uk/> .
- The proposed school could be an excellent building to benefit from a green roof. A school in Sheffield has had the roof designated as a Local Wildlife Site see <https://www.sheffield.gov.uk/out--about/parks-woodlands--countryside/ecology-service/local-nature-reserves/sharrow-school-green-roof.html> .

Do get in touch if you require clarification, or to discuss any of the issues raised.

Yours sincerely,

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



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Appendix 2.

Jo O'Sullivan
Access Selby
Market Cross Shopping Centre
Selby
North Yorks
YO8 4JS

11th July 2012
Your ref: 2012/0541/EIA

Dear Jo

Hybrid application for Olympia Park, Barlby Rd, Selby.

Thank you for consulting the Yorkshire Wildlife Trust on the above application. 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.

The Trust is in general happy with the level of survey effort and the amount of information on habitats present on the site. Although there are no designated sites in close proximity to the proposed development it is adjacent to the river Ouse which is a regionally important green corridor.

Protected species.

A number of protected species are found on site. The Trust is concerned that insufficient mitigation will be provided in the development for some of these species.

Water vole.

The Trust is of the opinion that the application does not give sufficient weight to the presence of water vole. The water vole survey on page 11 states that data was obtained from the North and East Yorkshire Data Centre and only 7 records from within 2km of the site were provided and they dated from 1999. A data search completed on the 5th July 2012 gave 76 records of water vole within 2km of the site recorded since 2000, with many of the records from a survey in 2006. This gives ten times as many records for the area around the development site.

Selby also has a regionally important population of water vole. Research carried out by the Wildlife Trusts nationally with support from the People's Trust for Endangered Species brought together water vole data from throughout England. The Trust can supply further information on this if it would be useful.

It will be essential that a detailed mitigation strategy and ecological management plan for water vole is provided and conditioned for this development to ensure the long term survival of the water vole population.



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Barn owl.

The survey for barn owl is not adequate as the buildings were not entered for health and safety reasons. In this situation it will be essential to take a precautionary approach and assume that the buildings are being used as a nest site by barn owls. The Natural England standing advice for breeding bird surveys found at http://www.naturalengland.org.uk/Images/BreedingBirds_tcm6-21703.pdf states that in the case of barn owls "Surveys for barn owls include inspections of all relevant features (e.g. internal/external inspection of barns, including any roof voids, or close up inspection of suitable tree holes/cavities), looking for signs of barn owl occupation, including droppings, pellets, feathers and nest debris". Barn owls were recorded foraging in the immediate vicinity of the development site during the breeding season. 90% of barn owl foraging is within 1km of the nest, so it is probable that a nesting site was situated in close proximity to the development site. The presence of barn owl also means there is good barn owl foraging habitat nearby and the loss of habitat has contributed to the alleged 70% decline in the UK Barn Owl population in the last 70-80 years. **A detailed barn owl mitigation and management plan will be required and must be conditioned.** See an Appendix to this letter with a more detailed assessment of the survey and what mitigation will be required.

Grass snake.

The surveys for reptiles showed that there is a population of grass snakes within the development site. The suggested mitigation and recommendations in section 6 of the Reptile Survey if conditioned should help to prevent damage to grass snake populations. As the ditches within the site will be very important for both water vole and grass snake, ditch protection and management will be an important issue for the development.

Plans of areas of habitat to be retained, managed and connected up will be required so that grass snake populations are protected. It will be essential that a detailed mitigation strategy and ecological management plan for grass snake is provided and conditioned for this development to ensure the long term survival of the grass snake population.

Green Infrastructure, and transport.

A number of comments made in our previous response to the scoping consultation for the development are still relevant and the previous response is included as an Appendix with this response.

The Trust is pleased to see that it is intended that the green infrastructure within the development will connect up areas important for wildlife, and that issues such as low levels of lighting and providing undisturbed habitat along the drains has been considered. Designing biodiversity into the SUDS will also help to mitigate for the development.

Flooding.

The site is within Flood Zone 3 and although extensive work has been done to show that the development will be unlikely to be affected by flooding the Trust has concerns that with increased variability in the weather and unseasonal flood events that the authority will need a very high level of proof to show that flooding will not be a threat to the development. Pump failure, extreme rainfall or lack of maintenance of flood defences due to financial constraints may not have been considered in the long term modelling of the vulnerability of the site. There does not appear to be any comment from the Environment Agency on the application. The Trust would expect that the local authority will ensure that expert guidance on this issue will be provided so that the authority does not just rely upon reports from the developers who will have a vested interest in ensuring the development goes ahead.



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Conclusions.

- Detailed plans for individual protected species, or an overarching plan for wildlife on the site needs to be conditioned and drawn up.
- A management plan and funding needs to be in place for the maintenance of habitats important for wildlife for the lifetime of the development.
- A condition for the presence of an Ecological Clerk of Works will also be essential during the building works.

The Trust would be able to provide support to the developers in drawing up or commenting on detailed plans. The Trust could also enter into discussions on the long term management of wildlife areas.

Do get in touch if you require clarification, or to discuss any of the issues raised.

Yours sincerely,

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



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