



Habitats Regulations Assessment of the City of York Council Local Plan

19 February 2019

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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 Handbook¹) 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.

¹ 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 ² (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)³ 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)⁴ 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)⁵ 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.

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

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

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

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

- 1.11. Defra guidance⁶ (expanded in C12 of the Handbook⁷) 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 sites⁸ 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 policy⁹, 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'.

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

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

⁸ 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

⁹ 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

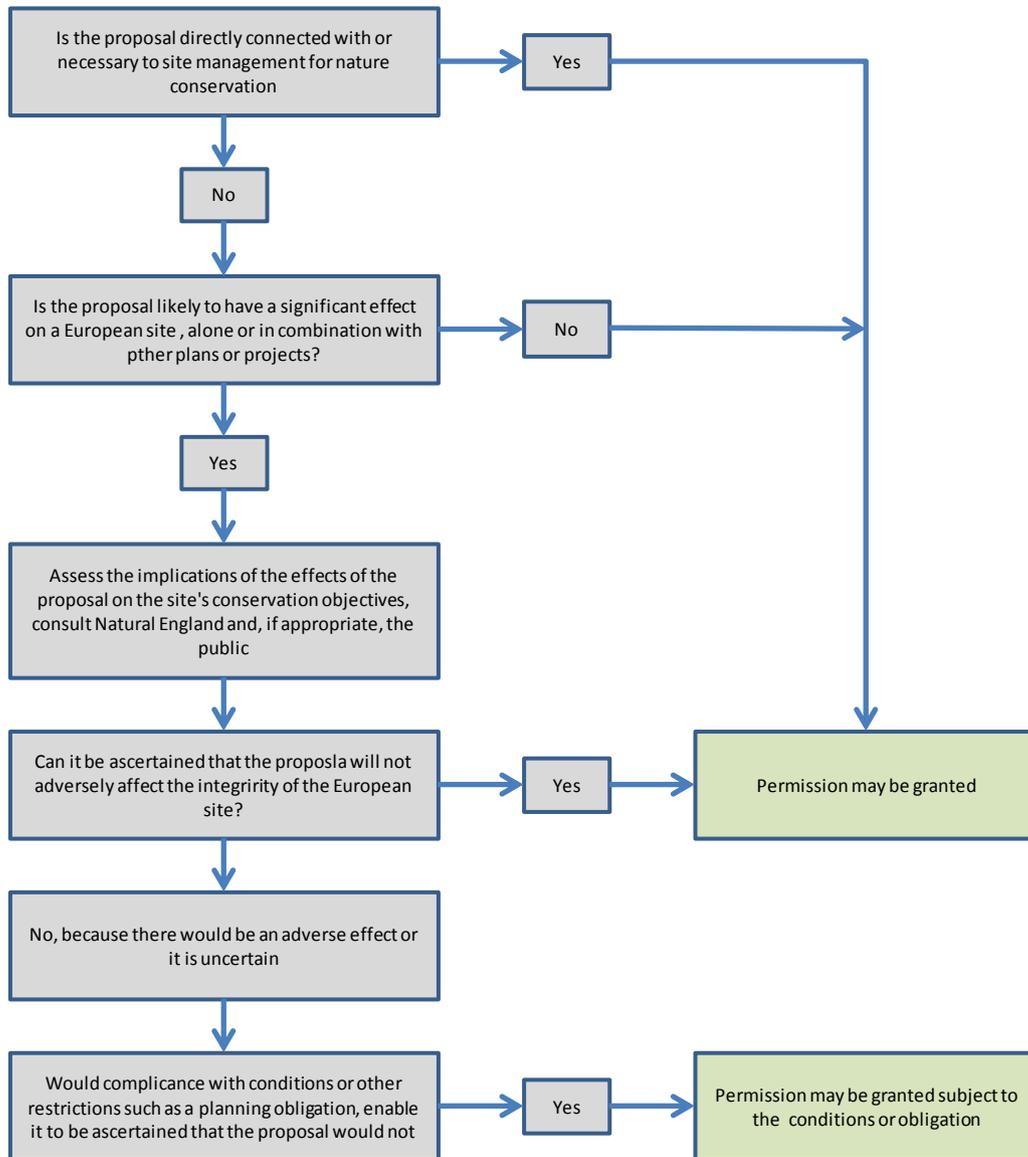
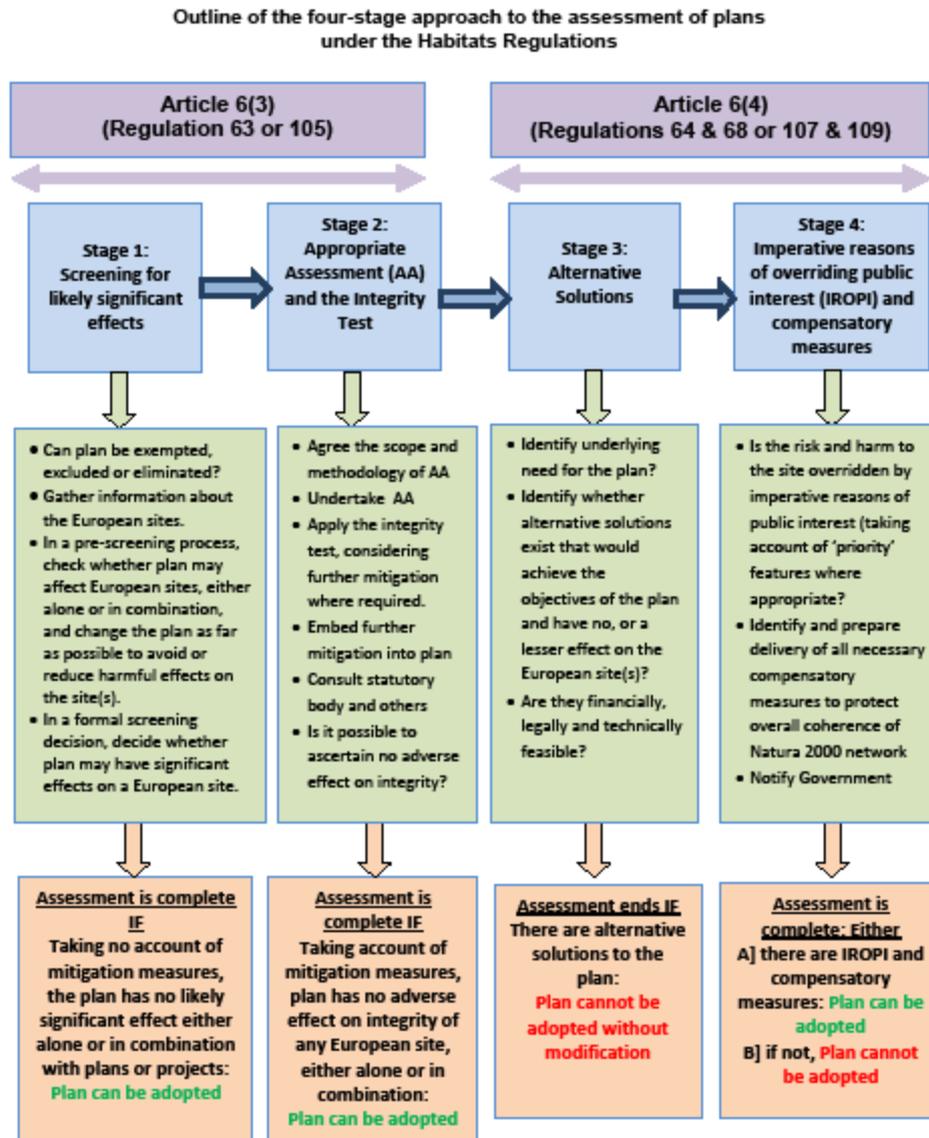


Figure 2: The four stage assessment of plans under the Habitats Regulations



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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’;¹⁰; 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 ...’;¹¹
 - *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 risk¹² 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 case¹³ 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 case¹⁴ 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.’

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

¹¹ 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

¹² 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

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

¹⁴ 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)¹⁵ 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)¹⁶ 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 UK¹⁷. However, the judgement¹⁸ 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 (Feeney¹⁹) 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.

¹⁵ Sweetman EU:C:2013:220 para 39

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

¹⁷ 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.

¹⁸ 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

¹⁹ 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*’²⁰ 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 Wind²¹ 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)^{22 23} 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.

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

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

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

^{23 23} 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 Plan²⁴. 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).

²⁴ 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, 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. 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, effects on the aquatic environment of Skipwith Common can be ruled out and are removed from further consideration.</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 Strensall Common will remain in the assessment.</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, effects on the marine environment on the Humber Estuary are removed from any further consideration in this HRA.</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
5. Plans that could affect mobile species	Sites whose qualifying features include mobile species which may be affected by the plan irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected	Humber Estuary (SPA, SAC, Ramsar) Kirk Deighton (SAC) Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC)	<p>This considers direct impacts of plan proposals on mobile species.</p> <p>Given that the great crested newts of Kirk Deighton SAC are will be restricted to the breeding pond and surrounding land, and that no development is proposed nearby, then adverse effects can be ruled out. Therefore, effects on mobile species at Kirk Deighton SAC are removed from any further consideration in this HRA.</p> <p>However, impacts on various bird, mammal and fish populations of the Humber, River Derwent and Lower Derwent Valley cannot be ruled out at this stage and so these sites remain in the HRA for further consideration.</p>	Humber Estuary Lower Derwent Valley River Derwent
6. Plans that could increase recreational pressure on European sites potentially vulnerable or sensitive to such pressure	(a) Such European sites in the plan area (b) Such European sites within an agreed zone of influence or other reasonable and evidence-based travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area	<p>Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Strensall Common (SAC)</p> <p>Humber Estuary (SPA, SAC, Ramsar) Kirk Deighton (SAC) Thorne Moor (SAC) Hatfield Moor (SAC) Thorne & Hatfield Moors (SPA) Skipwith Common (SAC)</p>	<p>Due to the proximity of development, impacts on the three European sites cannot be ruled out at this stage and so they remain in the HRA for further consideration.</p> <p>Kirk Deighton SAC lies around 15km from the nearest allocation on private land with no public access and so effects from recreational pressure at Kirk Deighton SAC are removed from any further consideration in this HRA.</p> <p>In terms of public pressure, the otherwise fragile sites of all the components of the Thorne & Hatfield Moors complex, display either restricted access and/or effective visitor management to strongly suggest that not only would visitor</p>	Lower Derwent Valley River Derwent Strensall Common Humber Estuary Skipwith 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
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 Thorne and Hatfield Moor sites are removed from any further consideration in this HRA.</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 and are removed from any further consideration in this HRA.</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 ²⁵ . All potentially affected sites can therefore be ruled out from further scrutiny.	
	(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. All potentially affected sites can be removed from further scrutiny.	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

²⁵ 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 impacts resulting from 'Disturbance' will be removed from further consideration in this HRA on all five European sites listed.	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

Conservation Objectives for Lower Derwent Valley SAC. 27 November 2018. (Version 3)

Draft Supplementary advice on conserving and restoring features. Lower Derwent Valley SAC. 29 June 2016

Site Improvement Plan. Lower Derwent Valley. 6 October 2014. V1.0

Ramsar Information Sheet Lower Derwent Valley SAC Citation. 8 June 1993

River Derwent SAC

River Derwent SAC Citation. 14 June 2005

Conservation Objectives for River Derwent SAC. 27 November 2018. (Version 3)

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.

Skipwith Common SAC

Skipwith Common SAC Citation. 14 June 2005

Conservation Objectives for Skipwith Common SAC. 27 November 2018. (Version 3)

Draft Supplementary advice on conserving and restoring features. Skipwith Common SAC. 25 January 2019

Skipwith Common Site Improvement Plan, Natural England, v1.0, 18 December 2014

Strensall Common SAC

Strensall Common SAC Citation. 14 June 2005

Conservation Objectives for Strensall Common SAC. 27 November 2018. (Version 3)

Draft Supplementary advice on conserving and restoring features. Strensall Common SAC. 25 January 2019

Strensall Common Site Improvement Plan, Natural England, v1.0, 18 December 2014

Humber Estuary SPA, SAC, Ramsar

Humber Estuary SPA Citation. 31 August 2007

Conservation Objectives for Humber Estuary SPA. 30 June 2014. (Version 3)

Humber Estuary SAC Citation. 10 December 2009

Conservation Objectives for Humber Estuary SAC. 27 November 201. (Version 3)

Humber Estuary Site Improvement Plan, Natural England, v1.1. 8 July 2015

Humber Estuary Ramsar Information Sheet. 31 August 2007

Table 2: Description of European Sites

Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
Lower Derwent Valley SPA, SAC, Ramsar		
<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>SPA</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>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 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"> 1. Hydrological changes (P); 2. Drainage (P); 3. Public access/Disturbance (T); 4. Invasive species (T); 5. Undergrazing (T); 6. Inappropriate scrub control (T); 7. Air pollution; impact of atmospheric nitrogen deposition (T); 8. Invasive species (Himalayan balsam) (T); 9. Invasive species (others) (T)

Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
<p>River Derwent SAC</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"> 1. Physical modification (P/T); 2. Water pollution (T); 3. Invasive species (T); 4. Change in land management (T); 5. Water abstraction (T).

Description (including summary of qualifying features)	Conservation objectives	Pressures and threats (P/T)
Skipwith Common SAC		
<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"> 1. Public access/Disturbance (P); 2. Inappropriate scrub control (T); 3. Drainage (T); 4. Air pollution: impact of atmospheric nitrogen deposition (P).
Strensall Common SAC		
<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"> 1. Public access/Disturbance (P); 2. Inappropriate scrub control (T); 3. Air pollution: impact of atmospheric nitrogen deposition (P).

Description (including summary of qualifying features)

Conservation objectives

Pressures and threats (P/T)

Humber Estuary SAC, SPA & Ramsar

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.

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.

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.

The corresponding SIP for the European site identifies, *inter alia*, a number of threats including water pollution and public pressure.

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.

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.

Given the similarity between Ramsar and SPA/SAC features, this HRA will restrict assessment to just the latter to avoid repetition.

SPA objectives

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;

The extent and distribution of the habitats of the qualifying features;

The structure and function of the habitats of the qualifying features;

The supporting processes on which the habitats of the qualifying features rely;

The population of each of the qualifying features; and,

The distribution of the qualifying features within the site.

SAC objectives

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:

The extent and distribution of qualifying natural habitats and habitats of qualifying species;

The structure and function (including typical species) of qualifying natural habitats;

The structure and function of the habitats of qualifying species;

The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;

The populations of qualifying species; and,

The distribution of qualifying species within the site.

1. Water pollution (P/T);
2. Coastal squeeze (T);
3. Changes in species distributions (T);
4. Undergrazing (P);
5. Invasive species (T);
6. Natural changes to site conditions (P/T);
7. Public access/Disturbance (P);
8. Fisheries: Fish stocking; (P)
9. Fisheries: Commercial marine and estuarine (P);
10. Fisheries: Commercial marine and estuarine (T);
11. Direct and take from development (T);
12. Air pollution: impact of atmospheric nitrogen deposition (P);
13. Shooting/scaring (P);
14. Direct impact from third party (T);
15. Inappropriate scrub control (P)

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^{26, 27} 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).

- 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 report²⁸ (see Appendix C). Independently, the City of York Council also commissioned the same company to perform a survey at Strensall Common²⁹ (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**

²⁸ 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

²⁹ 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 2012³⁰ 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_x) 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_x and the *critical loads* for nitrogen deposition.
- 3.71. Both NO_x 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_x is 30 µgm⁻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 Sussex³¹, 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.

³¹ This table is taken from the Handbook albeit with changes to the number and titles of Columns appropriate to this HRA.

³¹ 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)³² and the air quality assessment³³ 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_x 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_x 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_x 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.**

³³ 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_x 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_x 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_x 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_x concentration of 13.13µgm³ in 2015, falling over the Plan period to 8.40 µgm³. This means that concentrations of NO_x are currently below the annual Critical Level of 30 µgm³ across the entire European site and are expected to fall further. Therefore, in terms of NO_x the effect of the Plan is considered to be insignificant.
- 3.109. Further analysis showed that in terms of NO_x 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^{34, 35} 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).

³⁴ Amec Foster Wheeler Environment & Infrastructure Limited. December 2017. DIO York Sites: Queen Elizabeth Barracks (QEB). Information to support a Habitats Regulations Assessment.

³⁵ 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^{36, 37}. 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 Handbook³⁸ 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)

³⁶ Grazing management of heathlands. English Nature 2005.

<http://publications.naturalengland.org.uk/publication/72034>

³⁷ <https://www.buglife.org.uk/advice-and-publications/advice-on-managing-bap-habitats/lowland-heathland>

³⁸ 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⁻¹yr⁻¹ to 15.41 kgNha⁻¹yr⁻¹ 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⁻¹yr⁻¹.
- 4.50. Drawing on screening opinion, the Air Quality report showed that in terms of NO_x 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_x 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 210³⁹. 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⁻¹yr⁻¹. Yet, even the highest rate of deposition attributed to development of 0.281 kgNha⁻¹yr⁻¹ (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⁻¹yr⁻¹), The impact on the heathland

³⁹ 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_x concentration of 16.26 ug_m³ in 2015, falling over the Plan period to 10.40 ug_m³. Despite being a mean value, it can be safely assumed that concentrations of NO_x are currently below the annual Critical Level of 30 ug_m³ 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⁻¹yr⁻¹ to 11.11 kgNha⁻¹yr⁻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 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_x 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⁻¹yr⁻¹) 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⁻¹yr⁻¹ and a PEC of 9.52 kgNha⁻¹yr⁻¹, 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⁻¹yr⁻¹, 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⁻¹yr⁻¹.
- 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 km² 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.

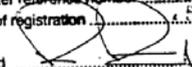
The site qualifies under Article 4.1. by regularly supporting nationally important winter numbers of the following Annex 1 species: 70 Bewick's swan *Cygnus columbianus bewickii* (1% of the UK wintering population), 4,120 Golden plover *Pluvialis apricaria* (2% of the UK wintering population) and 50 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*

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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*

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Skipwith Common 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: Skipwith Common

Unitary Authority/County: North Yorkshire

SAC status: Designated on 1 April 2005

Grid reference: SE668362

SAC EU code: UK0030276

Area (ha): 295.20

Component SSSI: Skipwith Common SSSI

Site description:

The wet heath at Skipwith Common is the most extensive of its type in the north of England. The *Erica tetralix* – *Sphagnum compactum* community is dominated by cross-leaved heath *Erica tetralix* and purple moor-grass *Molinia caerulea*. There is a small population of marsh gentian *Gentiana pneumonanthe*. 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 *Calluna vulgaris* – *Deschampsia flexuosa* heath dominated by heather *Calluna vulgaris*.

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:

- European dry heaths
- Northern Atlantic wet heaths with *Erica tetralix*. (Wet heathland with cross-leaved heath)

Strensall Common SAC

SAC citation and 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: Strensall Common

Unitary Authority/County: York

SAC status: Designated on 1 April 2005

Grid reference: SE651598

SAC EU code: UK0030284

Area (ha): 569.63

Component SSSI: Strensall Common SSSI

Site description:

Strensall Common is an example of acidic lowland heath represented predominantly by *Erica tetralix* – *Sphagnum compactum* wet heath, although its extent has been reduced by drainage. It is a noted locality for marsh gentian *Gentiana pneumonanthe*, narrow buckler-fern *Dryopteris carthusiana* and the dark-bordered beauty moth *Epione vespertaria* as it is associated with creeping willow *Salix repens* on the wet heath.

There is also a complex mosaic of wet heaths with *Erica tetralix* and dry heath elements. The *Calluna vulgaris* – *Deschampsia flexuosa* dry heath is noted for petty whin *Genista anglica* and bird's-foot *Ornithopus perpusillus*.

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:

- European dry heaths.
- Northern Atlantic wet heaths with *Erica tetralix* (wet heathland with cross-leaved heath).

Appendices

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 maritimae*)
- 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 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

Appendices

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1

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

Appendices

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1

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

Appendices

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1

C. Lower Derwent and Skipwith Common Visitor Surveys

Appendices

HRA of City of York Local Plan (February 2019)

Project Number: WIE13194-104

Document Reference: WIE13194-104-1-1



**FOOTPRINT
ECOLOGY**



Visitor surveys at the Lower Derwent
SPA/SAC and Skipwith Common SAC.

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FOOTPRINT ECOLOGY

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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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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’).

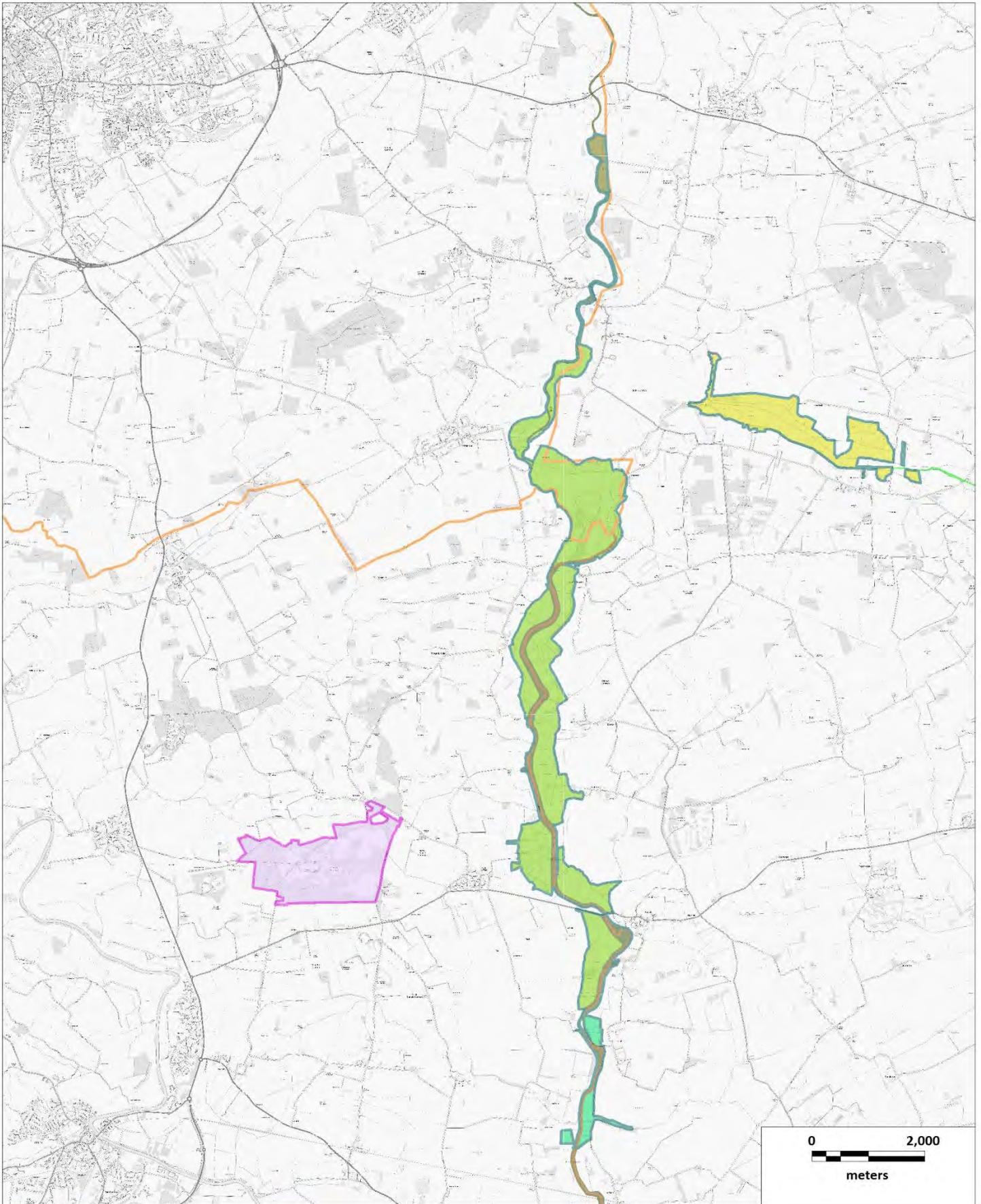
Relevant Local Plans and the need for this work

- 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.

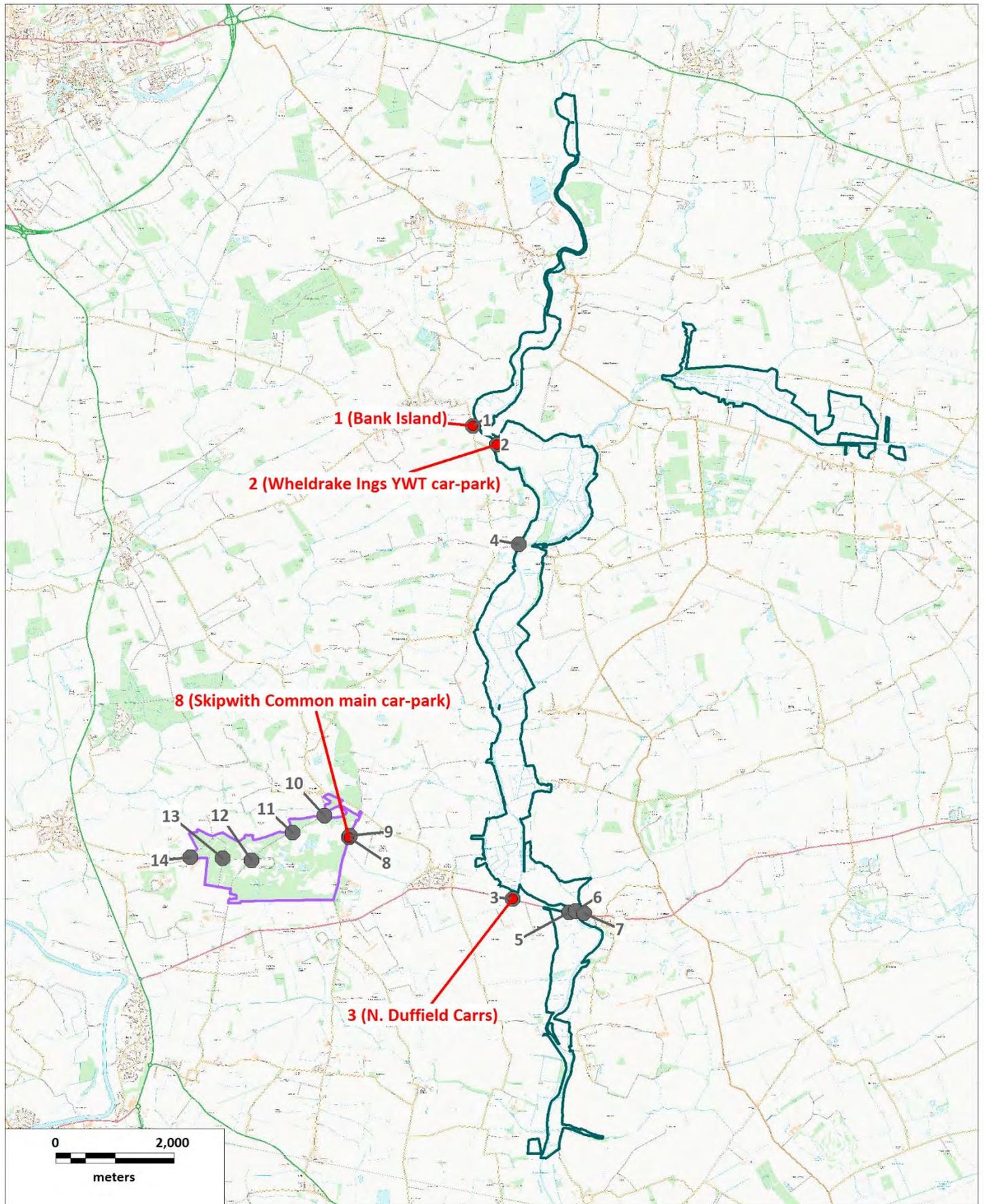
Car-park counts

- 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.

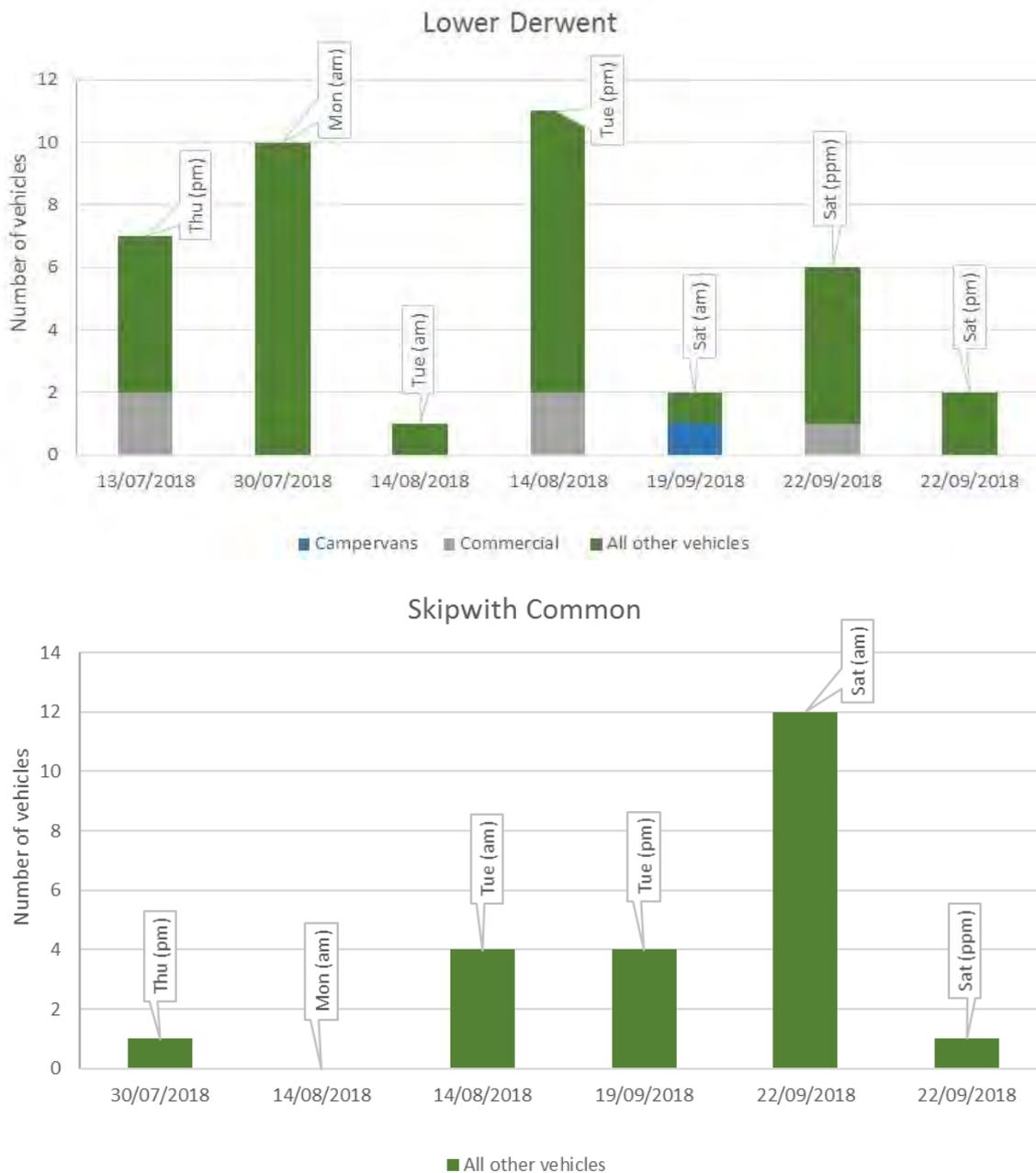
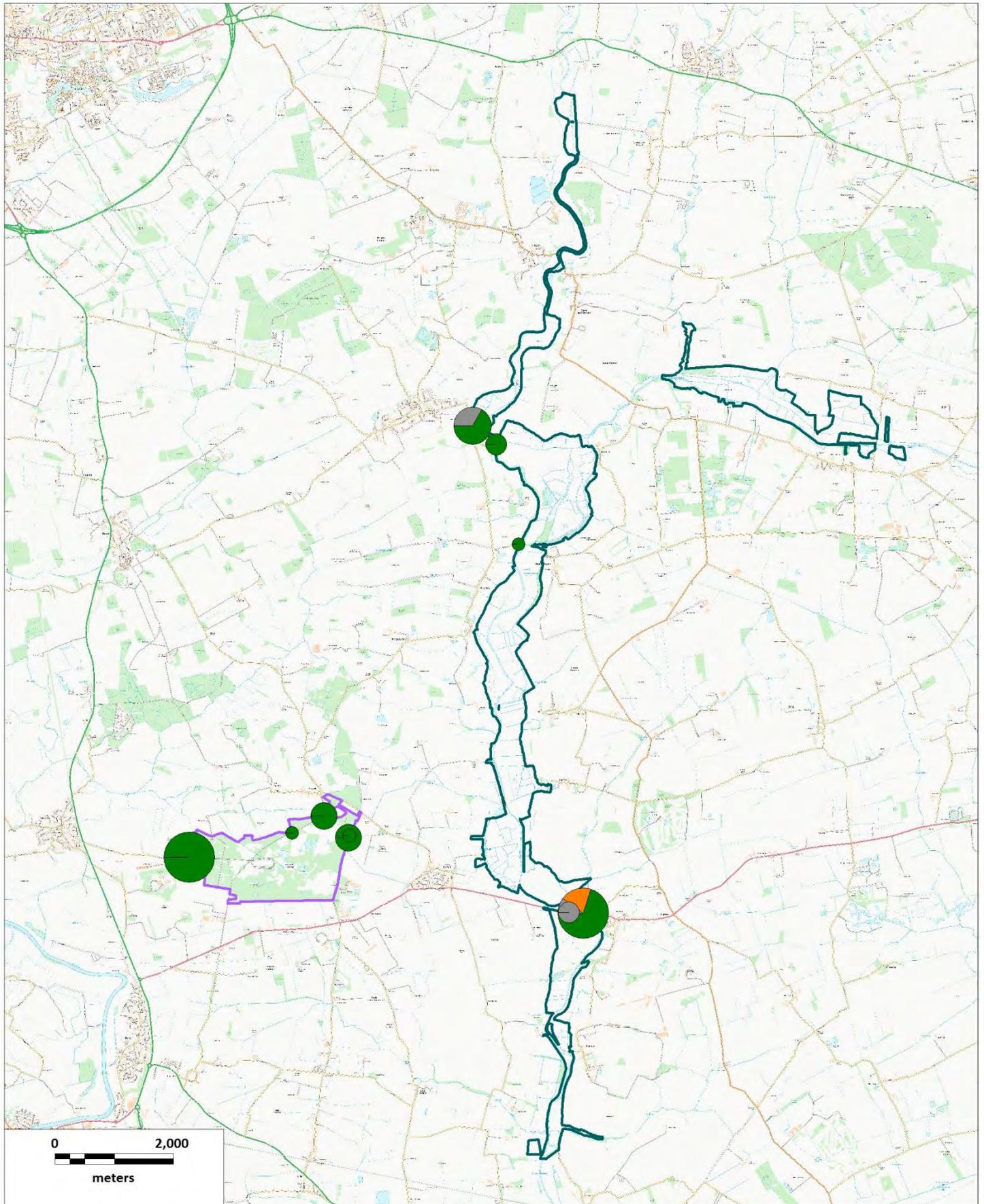


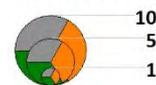
Figure 1: Car-park transect results by date and vehicle types

- 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



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 Carrs¹. 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
	Total	18	8	11	0	14	17	68	4.3
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
	Total	32	18	19	0	21	60	150	9.4
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
	Total	0	1	0	0	1	0	2	0.1
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
	Total	5	0	1	0	14	14	34	2.1

¹ 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)
Total	9 (18)	20 (40)	21 (42)	50 (100)

- 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.

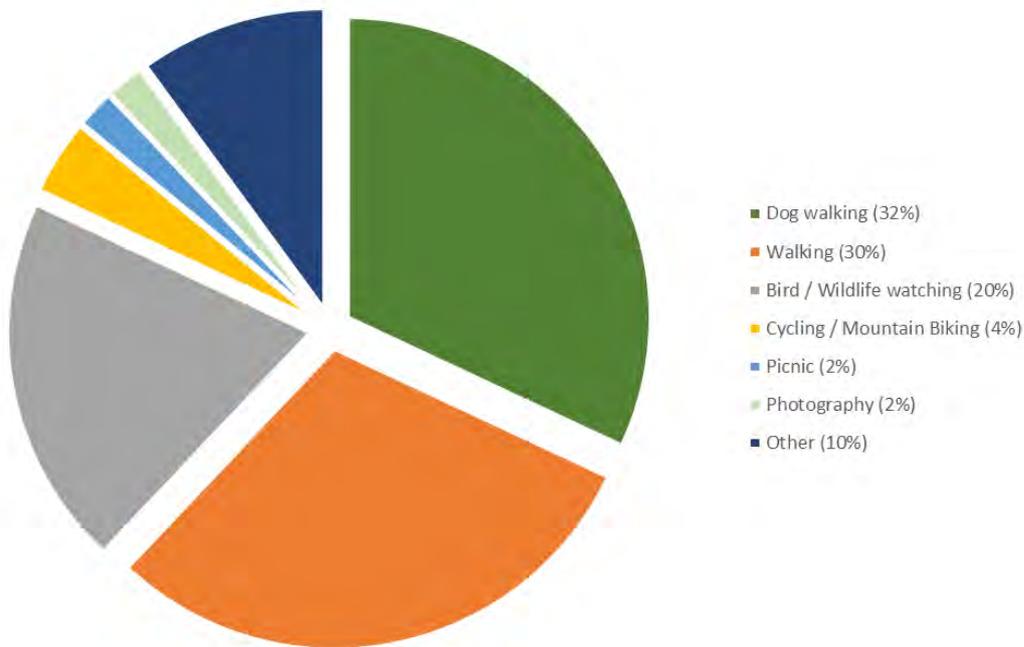


Figure 2: Activities undertaken (all 50 interviewees); from Q2.

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)
Total	9 (100)	20 (100)	21 (100)	50 (100)

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)
Total	2 (4)	5 (10)	7 (14)	6 (12)	3 (6)	16 (32)	8 (16)	3 (6)	50 (100)

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.

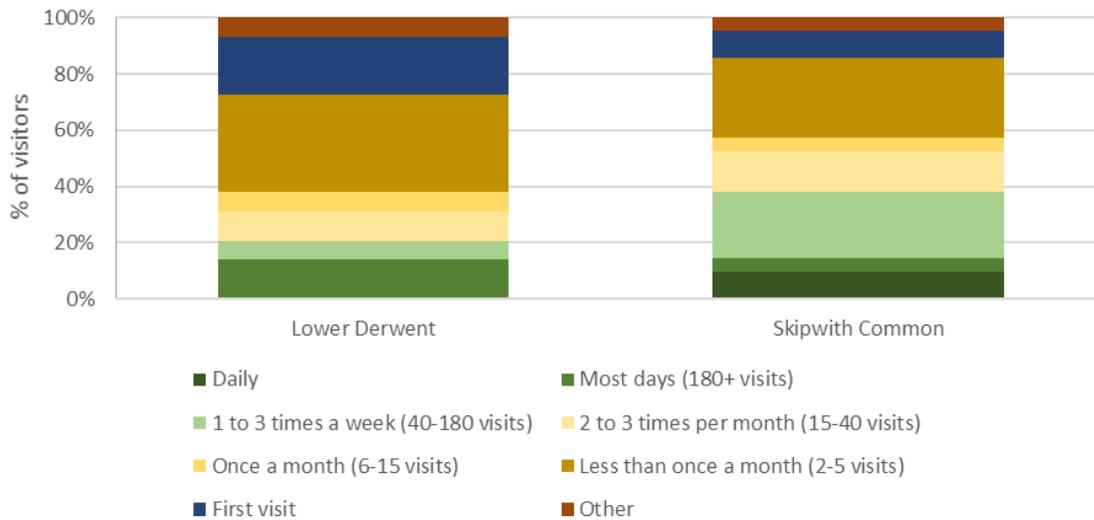


Figure 3: Frequency of visit (Q3) by European site.

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).

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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)
Total	8 (16)	11 (22)	20 (40)	10 (20)	1 (2)	50 (100)

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)
Total	8 (16)	11 (22)	20 (40)	10 (20)	1 (2)	50 (100)

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)
Total	4 (8)	10 (20)	6 (12)	6 (12)	9 (18)	9 (18)	16 (32)	8 (16)	50 (100)

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Common

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)
Total	8 (16)	10 (20)	7 (14)	7 (14)	22 (44)	9 (18)	50 (100)

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)
Total	8 (16)	1 (2)	2 (4)	2 (4)	5 (10)	9 (18)	23 (46)	50 (100)

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)
Total	8 (16)	1 (2)	2 (4)	2 (4)	5 (10)	9 (18)	23 (46)	50 (100)

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.

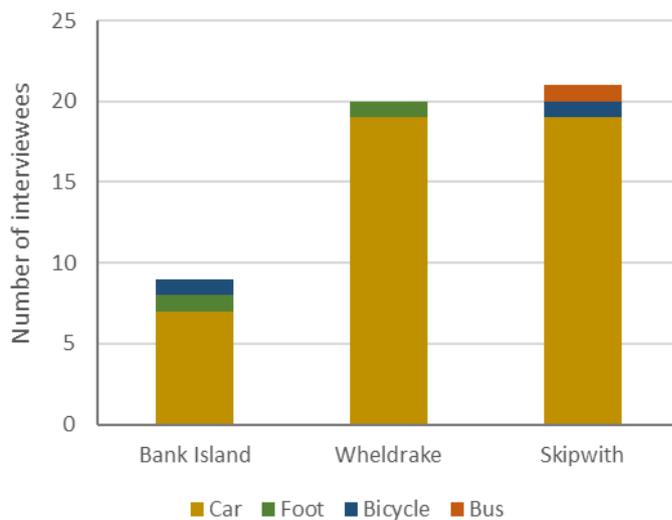


Figure 4: Numbers of interviewees by mode of transport (Q8) and survey point.

- 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.

Visitor surveys Lower Derwent and Skipwith Common

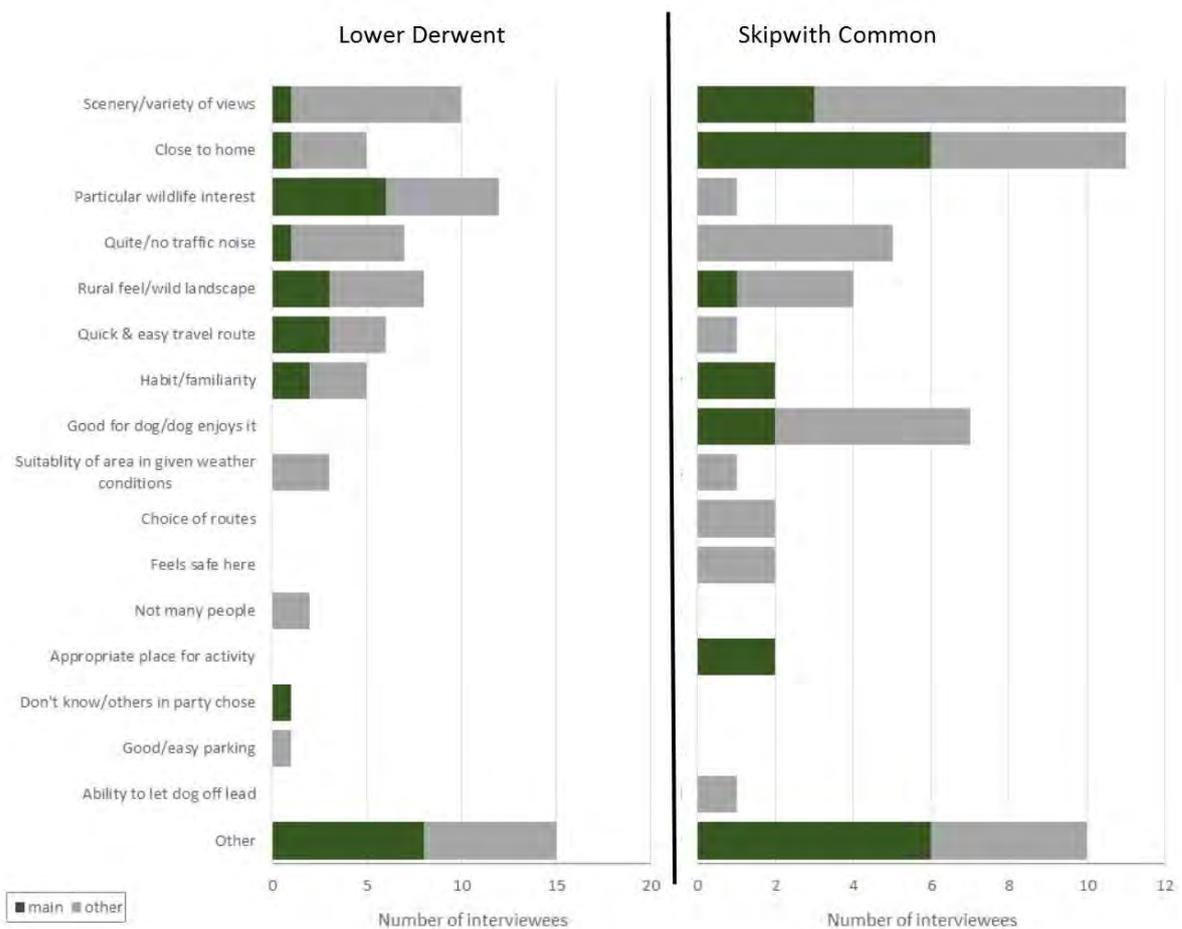


Figure 5: Reasons for site choice (Q13).

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.

Visitor surveys Lower Derwent and Skipwith
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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)
Total	2 (4)	9 (18)	3 (6)	5 (10)	23 (46)	8 (16)	50 (100)

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

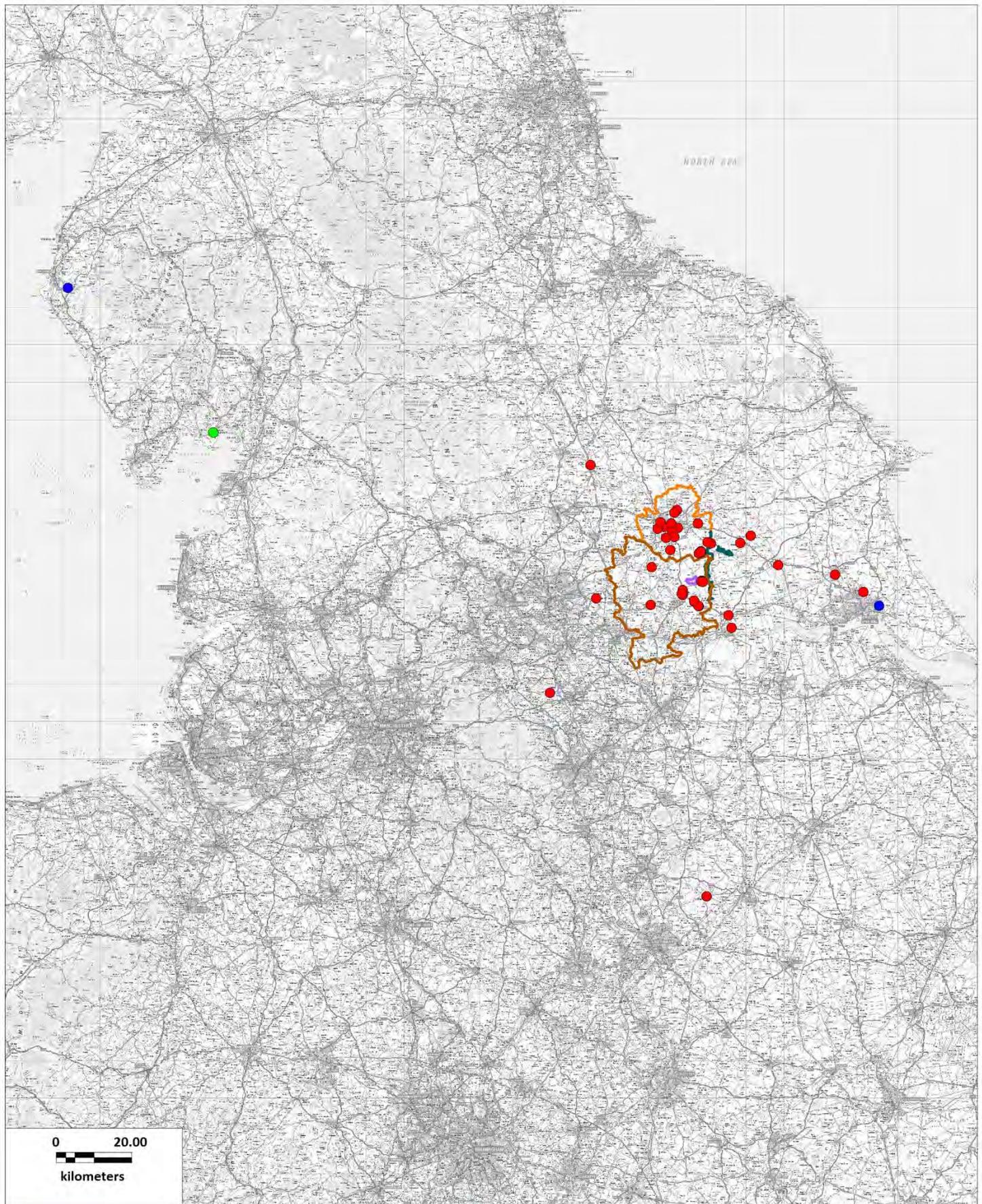
Visitor surveys Lower Derwent and Skipwith Common

Site name	Lower Derwent	Skipwith Common
Wheldrake Ings	1	
Wheldrake Woods	2	
York		1
Total	22	16

Visitor origins (Q18)

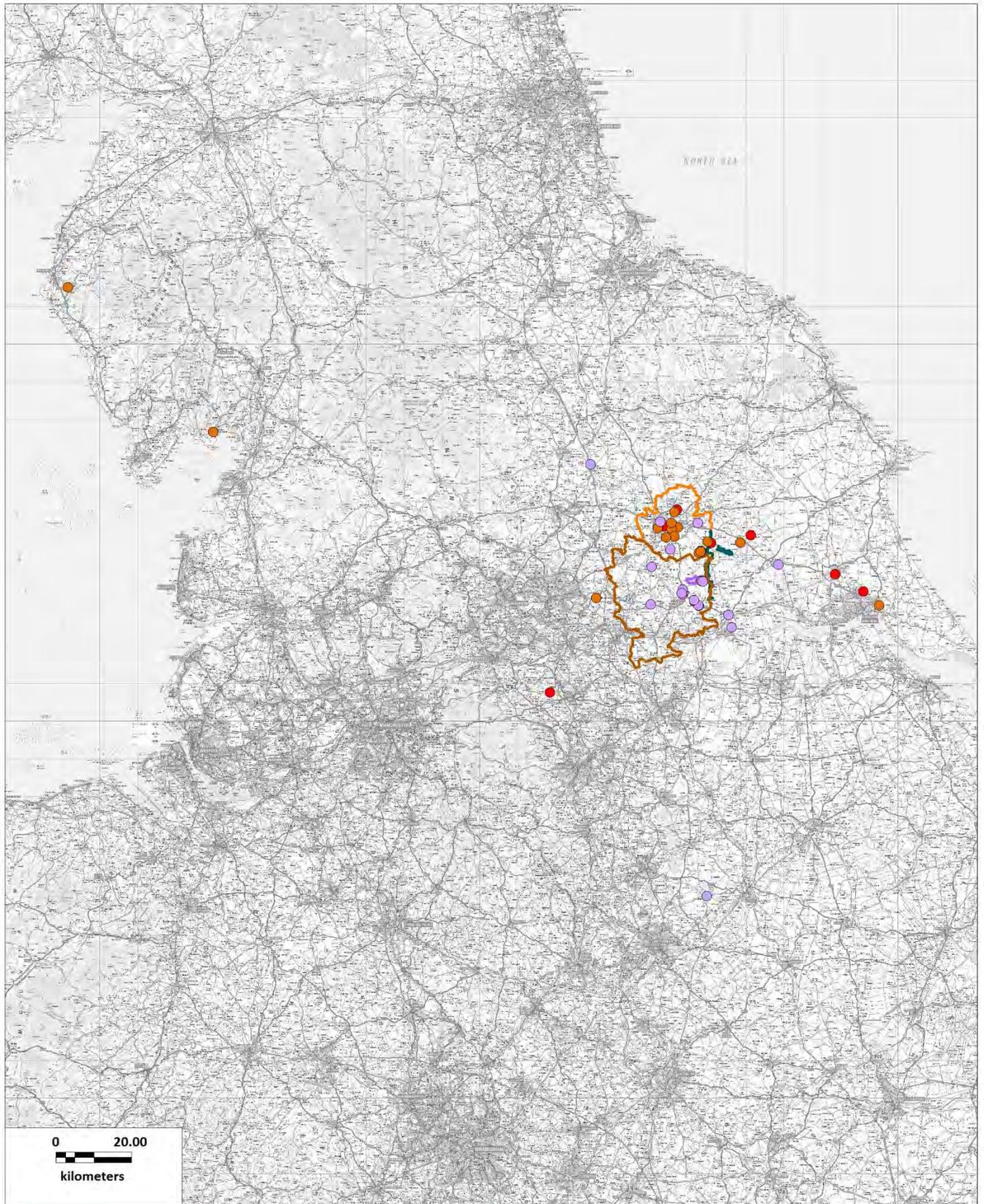
- 5.19 A total of 48 interviewee postcodes could be accurately mapped, with the full postcode given in the interview matching the standard national postcode database. A total of 2 (4%) of interviews were therefore not assigned to a home postcode.
- 5.20 Postcode data are mapped in Maps 4-7. Map 4 shows 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



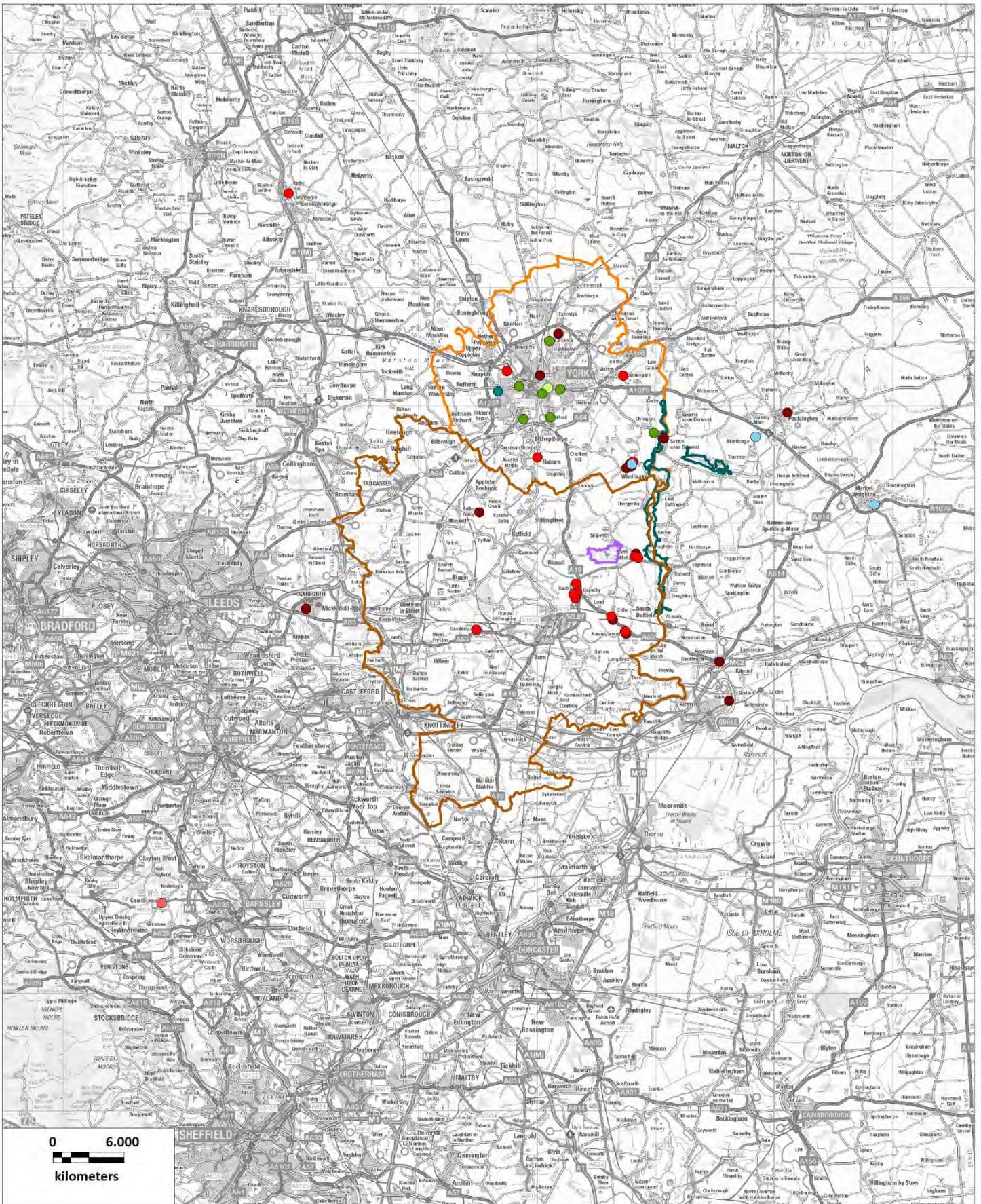
	City of York		Lower Derwent Valley SPA		Day trip/short visit and travelled directly from home today	(44)
	Selby		Skipwith Common SAC		Day trip/short visit & staying away from home with friends or family	(1)
					Staying away from home, e.g. second home, mobile home or on holiday	(2)
					Other	(1)

Map 5: All postcodes by survey point



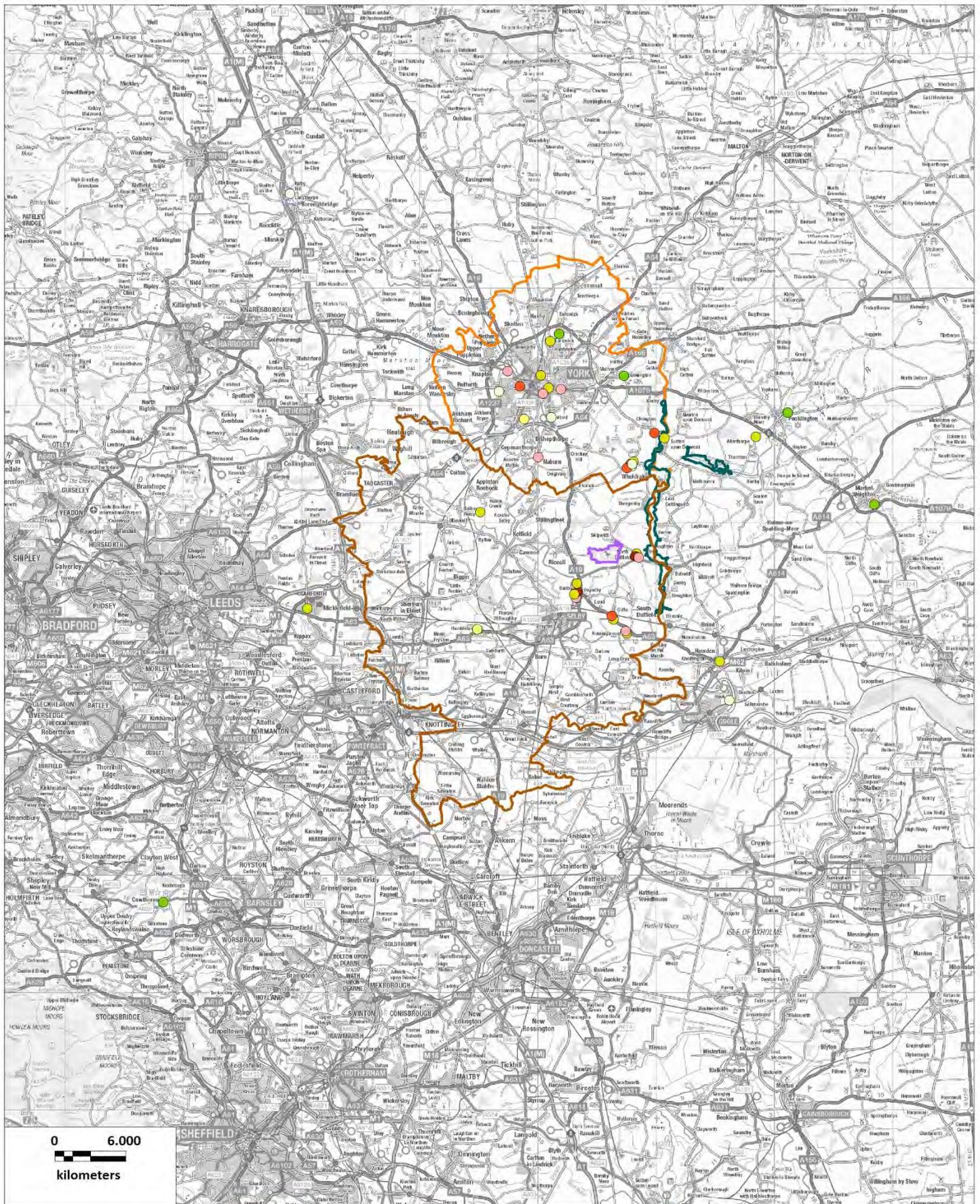
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|-------------------------------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------|-----------------|------|
|  | 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)



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Map 7: Postcodes by frequency of visit (note 7 postcodes outside map window)



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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 (75th 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 75th percentile.

Variable/type of interviewee	N	Distance (km)				
		Mean (+ 1 SE)	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 sites². 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

² The distance bands were drawn separately around Skipwith Common SAC and the Lower Derwent SPA

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

Visitor surveys Lower Derwent and Skipwith Common

Lower Derwent SPA

Skipwith Common SAC

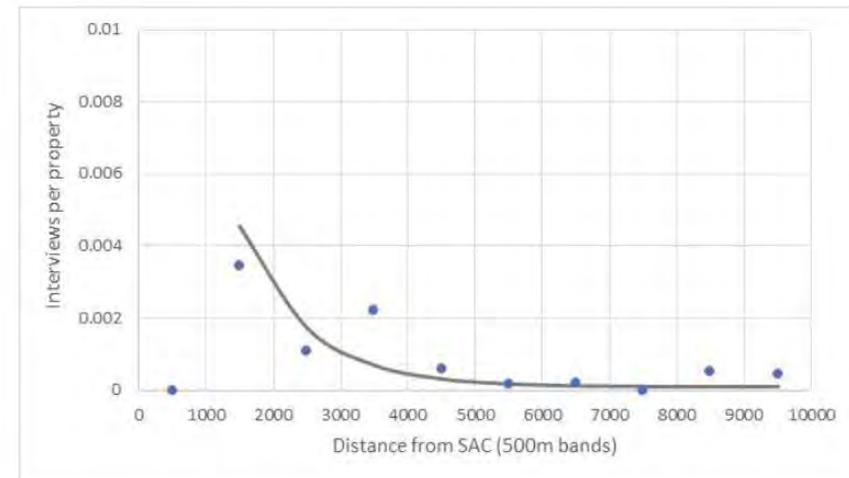
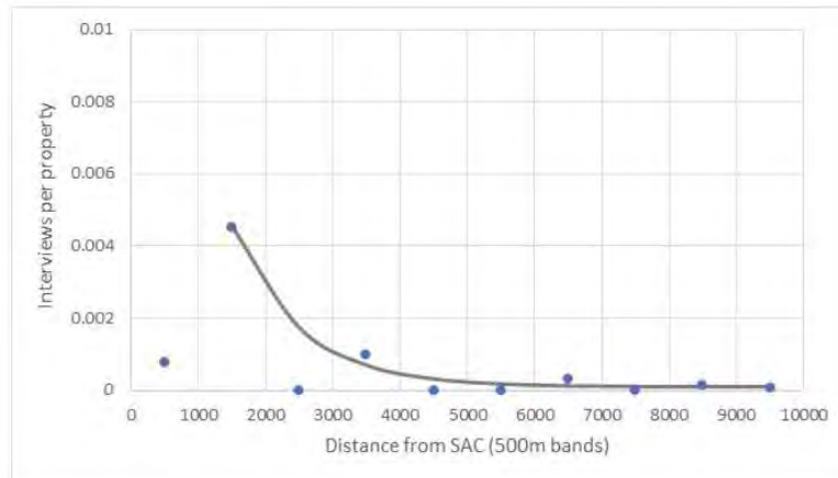
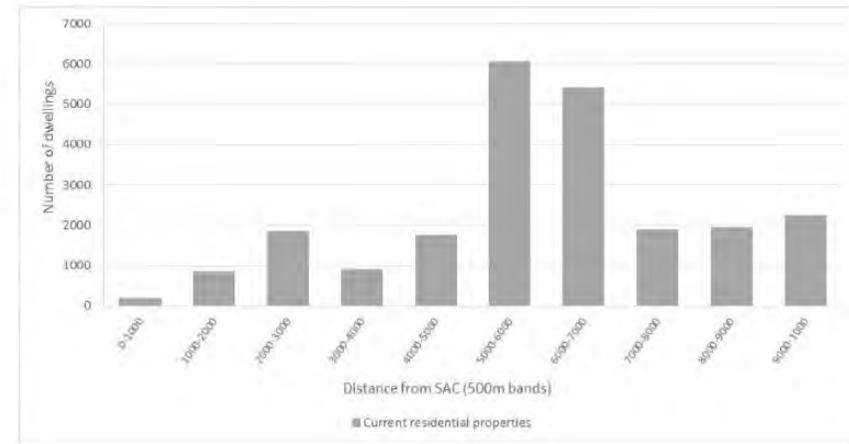
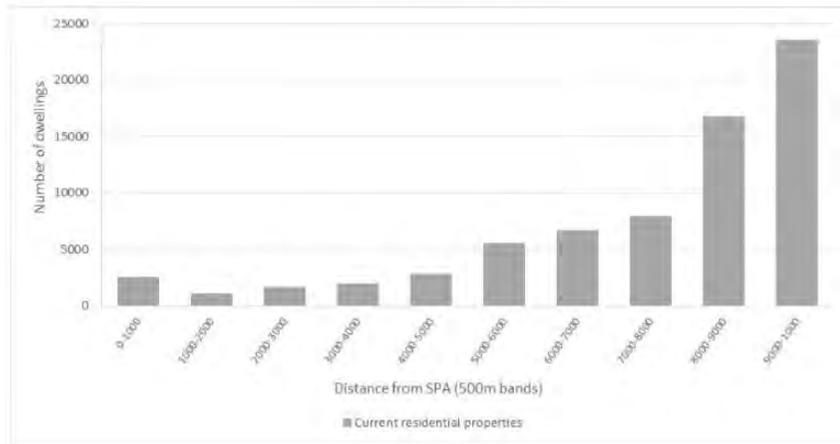


Figure 6: Levels of current housing per 1km distance band (upper graphs) and interviews per property in relation to distance (lower graphs). Interviews per property is calculated by dividing the number of interviewees who originated in each 1km band by the number of residential properties in the band. 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.

Visitor surveys Lower Derwent and Skipwith Common

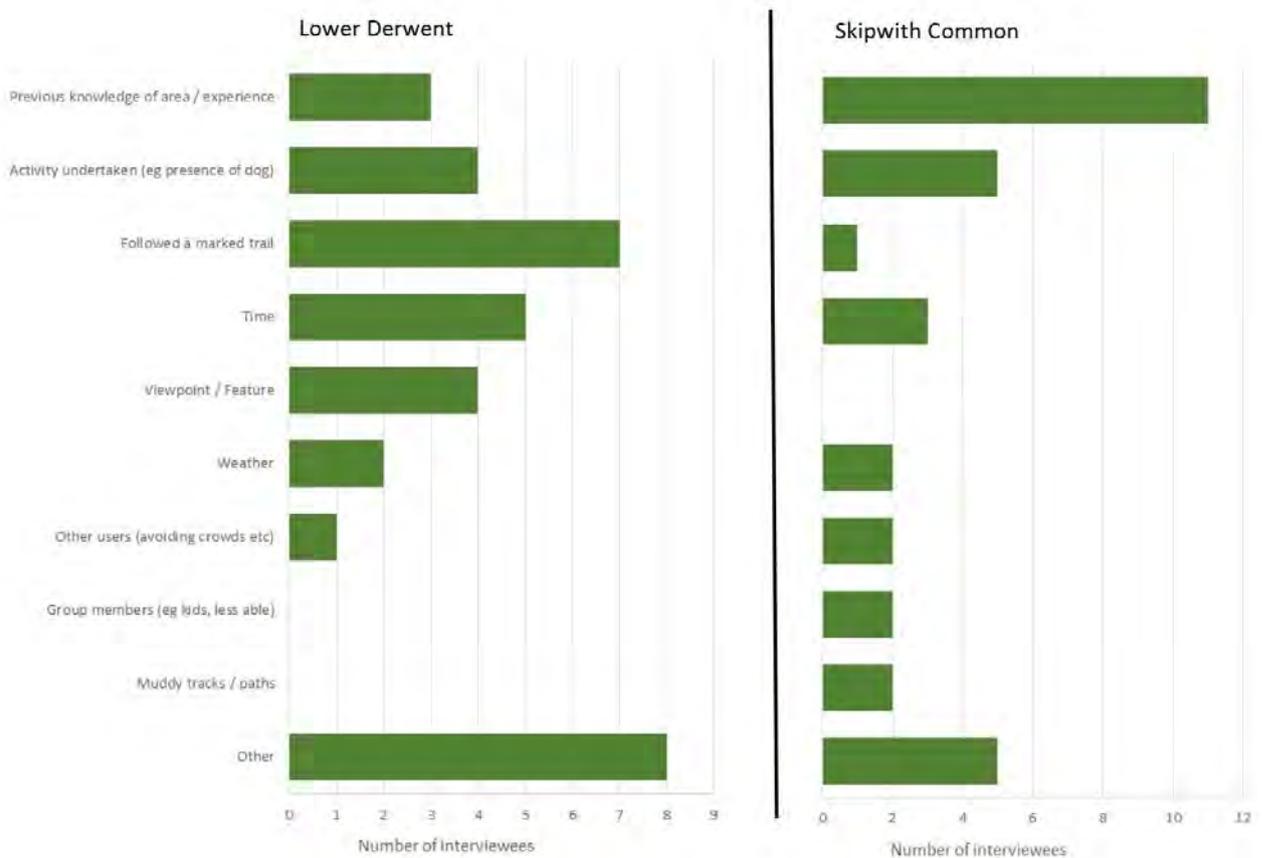


Figure 7: Factors influencing choice of route (Q12). Note interviewees could give multiple responses.

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., $p=0.557$).

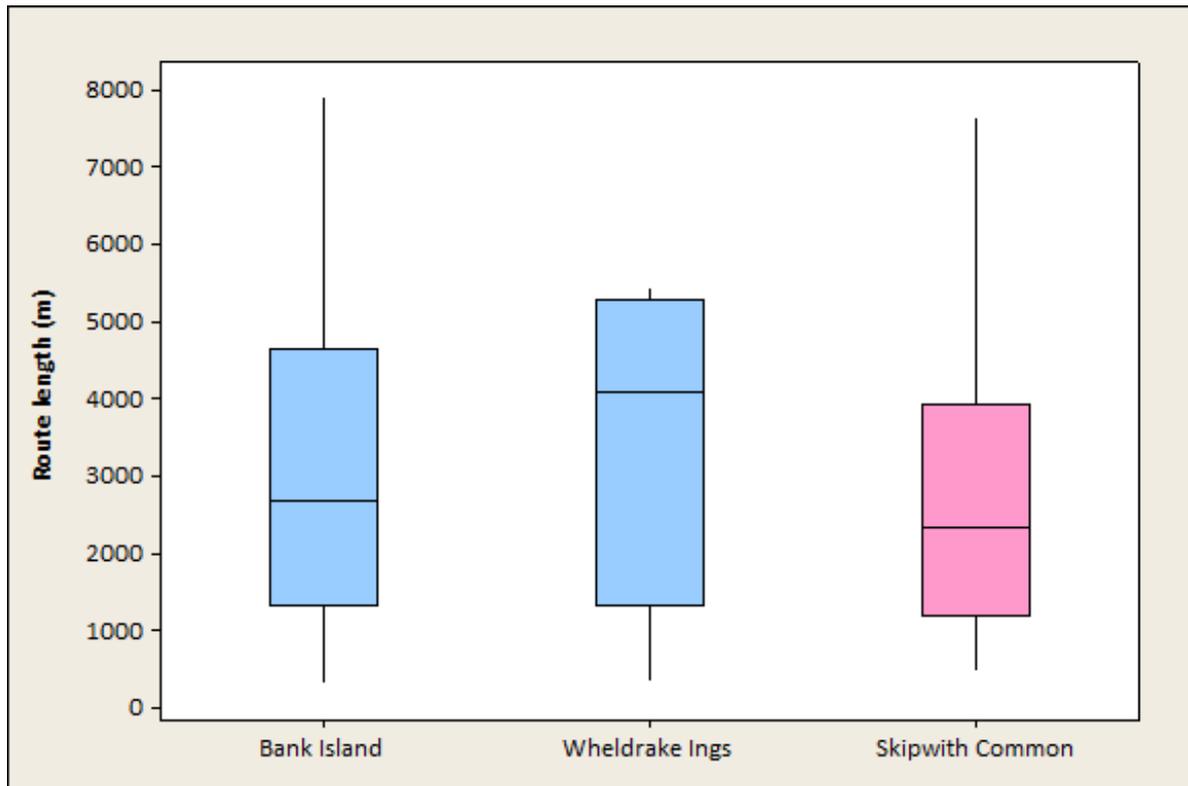
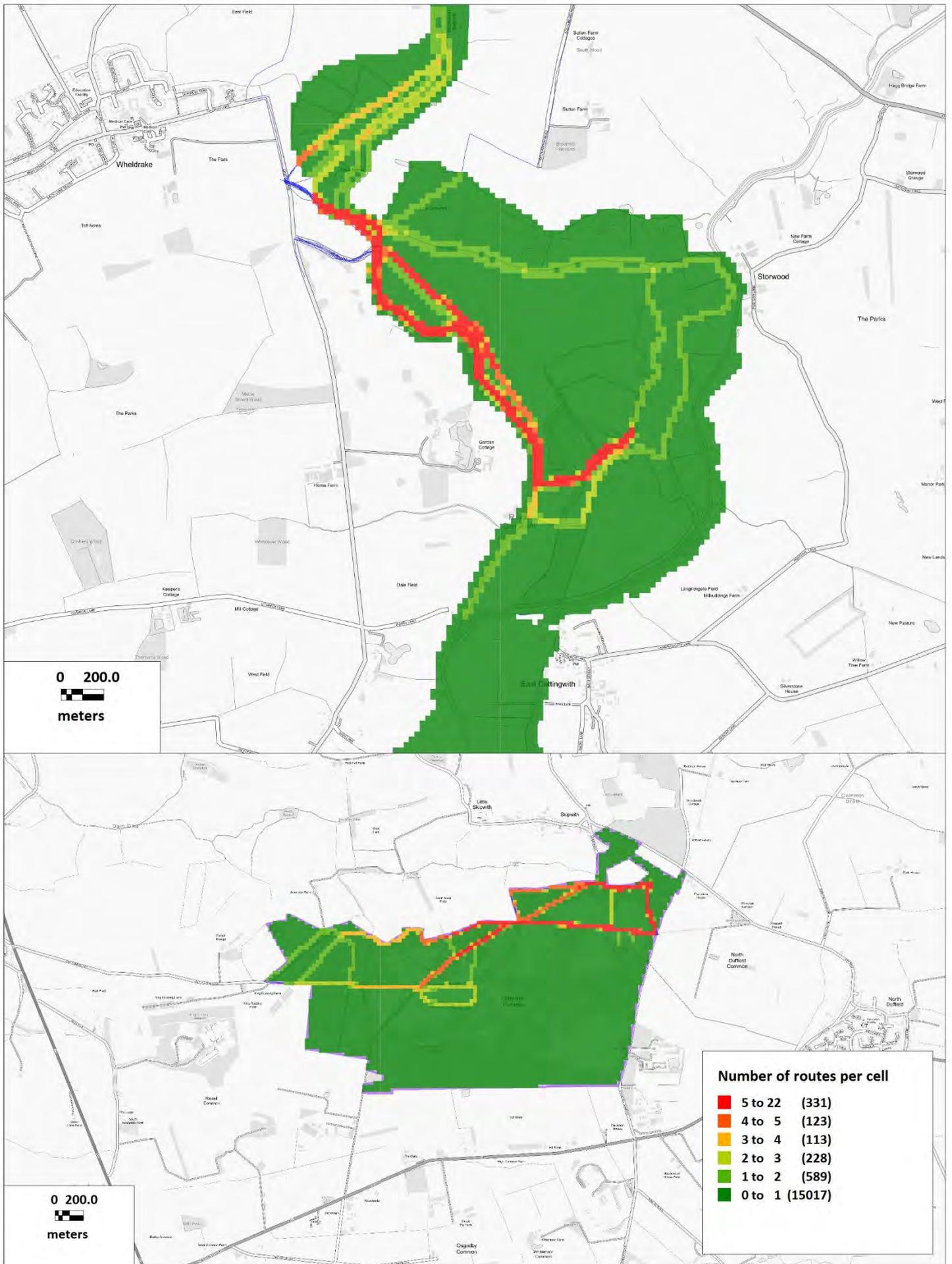


Figure 8: Box plot showing route lengths for all interviewees at each survey point. Blue shading reflects the two Lower Derwent sites. Horizontal lines show the median, boxes show the inter-quartile range and whiskers reflect the limit of the data.

- 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

Visitor surveys Lower Derwent and Skipwith
Common

- 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 Valley³, 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 Common⁴, 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

³ See [Natural England website](#) for details

⁴ 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 75th 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:	<div style="border: 1px solid black; height: 30px; width: 100%;"></div>	

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

Visitor surveys Lower Derwent and Skipwith
Common

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

Visitor surveys Lower Derwent and Skipwith
Common

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.

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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 75th 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:

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- 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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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 records¹. 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

¹ 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

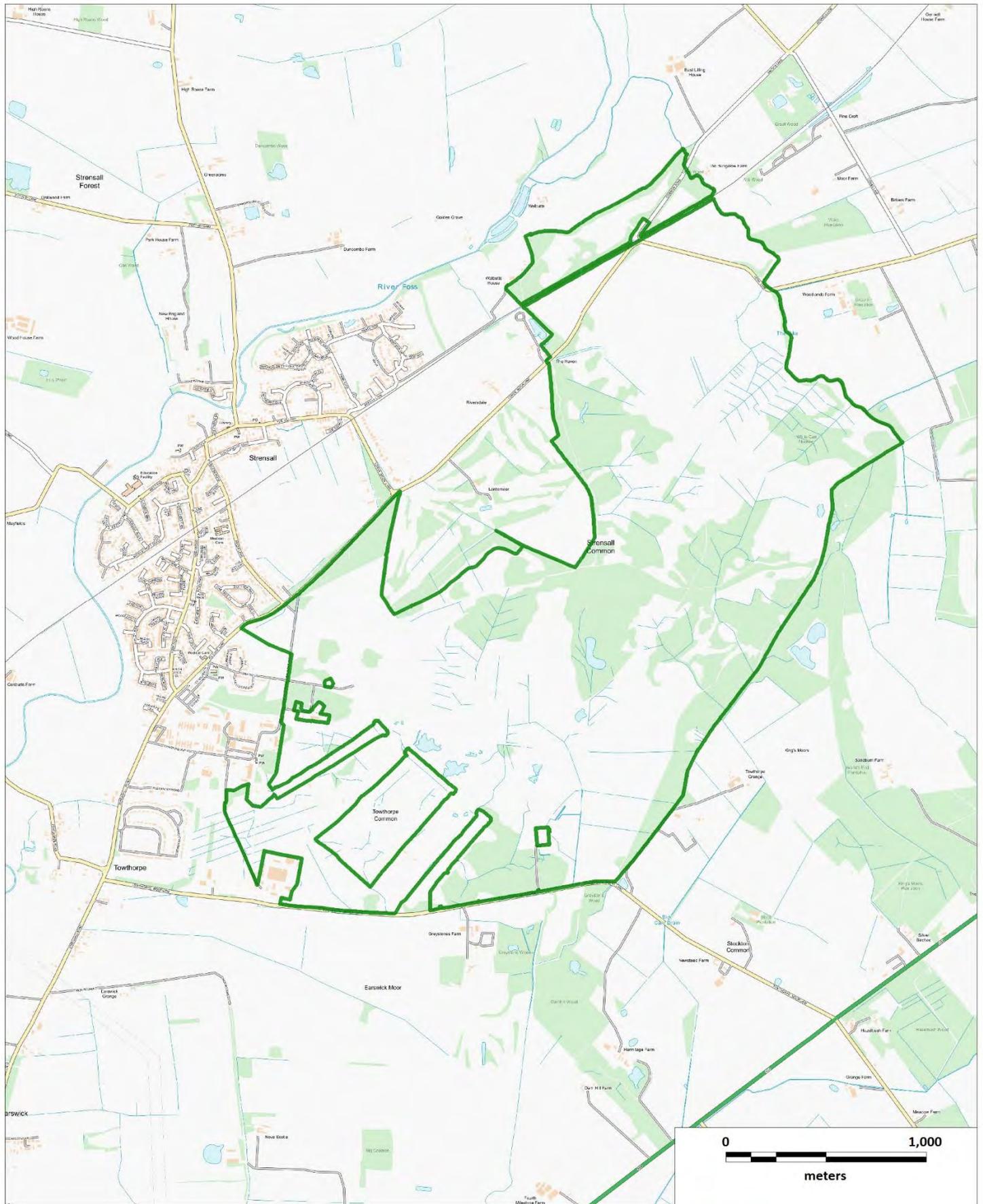
- 1.8 It is the HRA work for the City of York Local Plan and consultation advice from Natural England that has identified the issue of increased recreational

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 Council² 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.

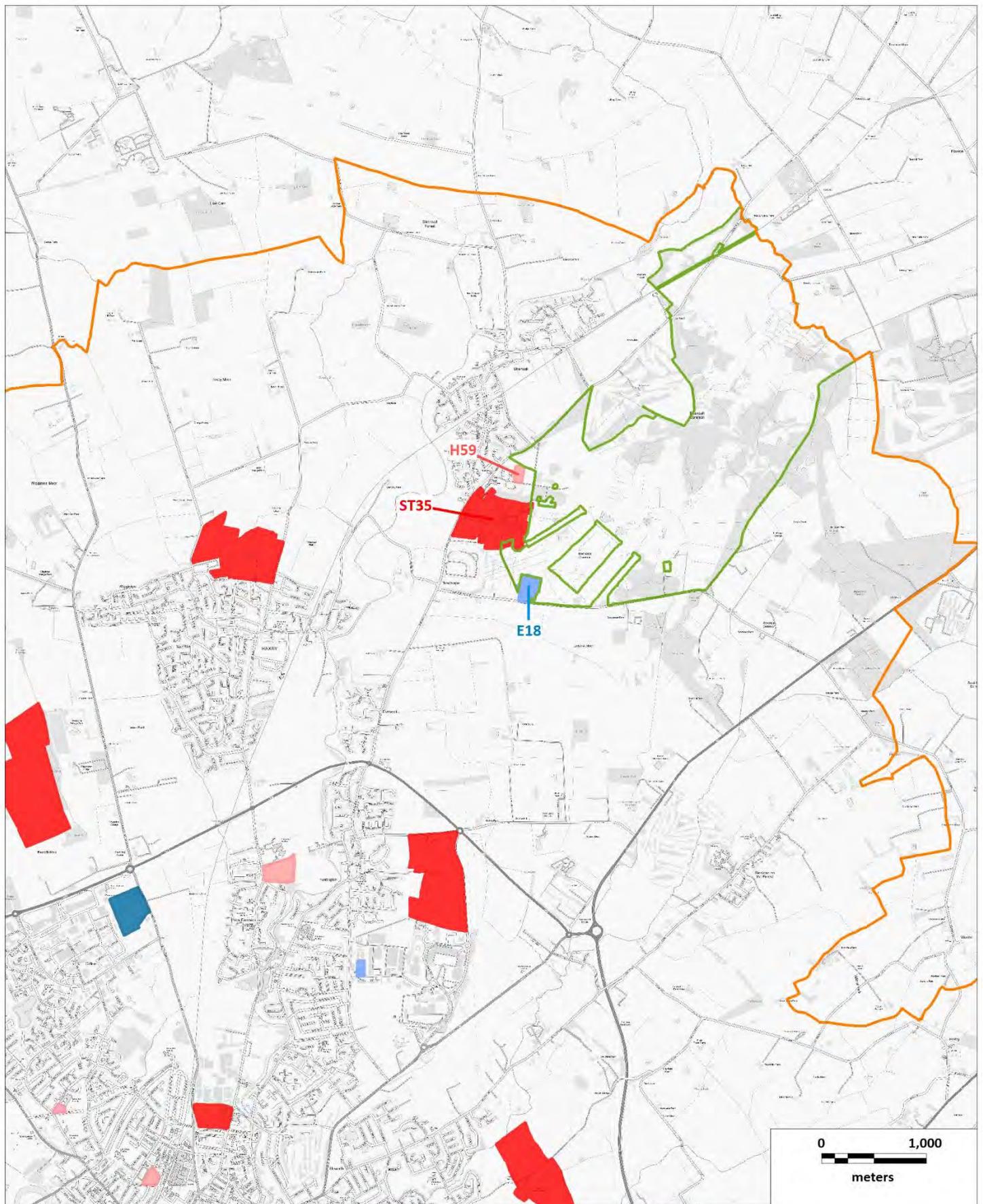
² Letter dated 4th June 2018

Map 1: Strensall Common SAC

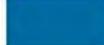
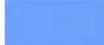


 Strensall Common SAC

Map 2: SAC and Local Plan allocations (labelled sites those identified in HRA)



 City of York boundary
 Strensall Common SAC

 Local Plan strategic housing allocation
 Local Plan general housing allocation
 Local Plan strategic employment allocation
 Local Plan general employment allocation

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).

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

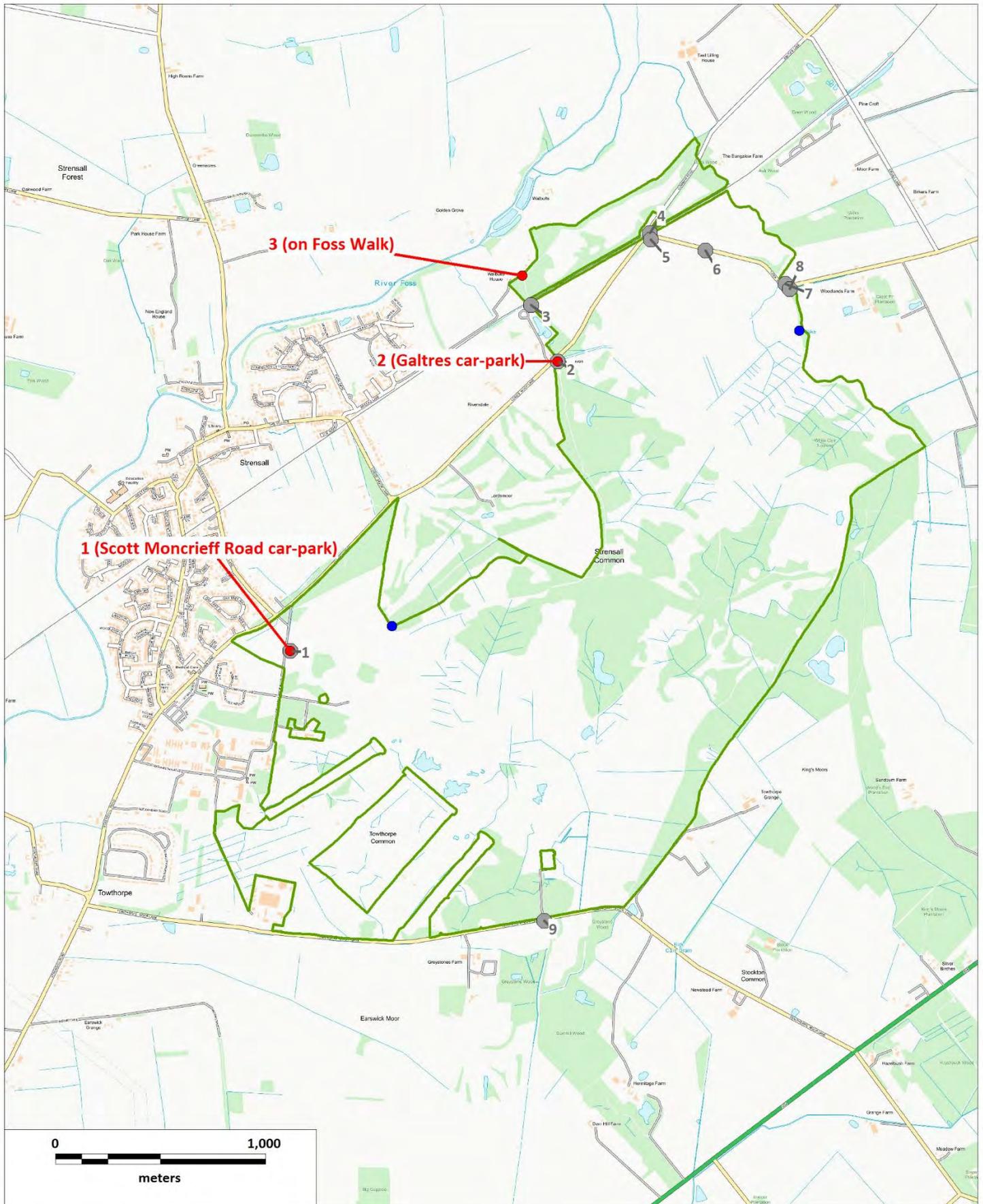
- 2.18 A site visit to map vegetation types and features and record current evidence of recreational pressure was carried out between 13th- 15th September.

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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 UKHab³ (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).

³ <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).

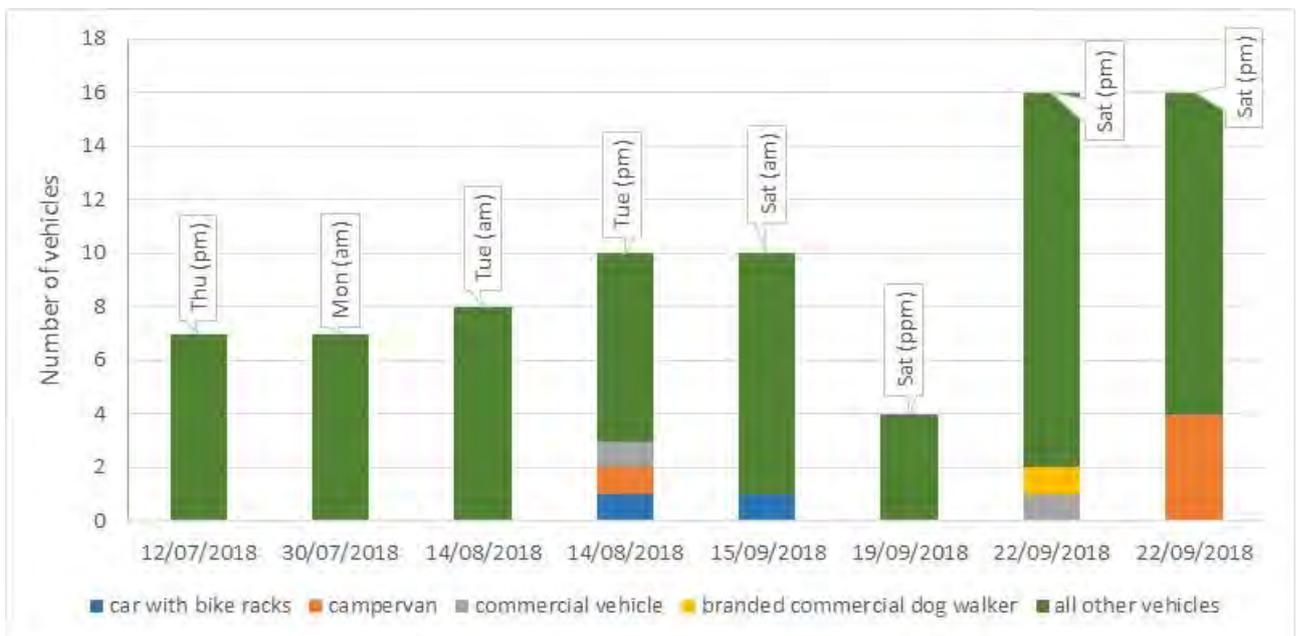


Figure 1: Car-park transect results by date and vehicle types

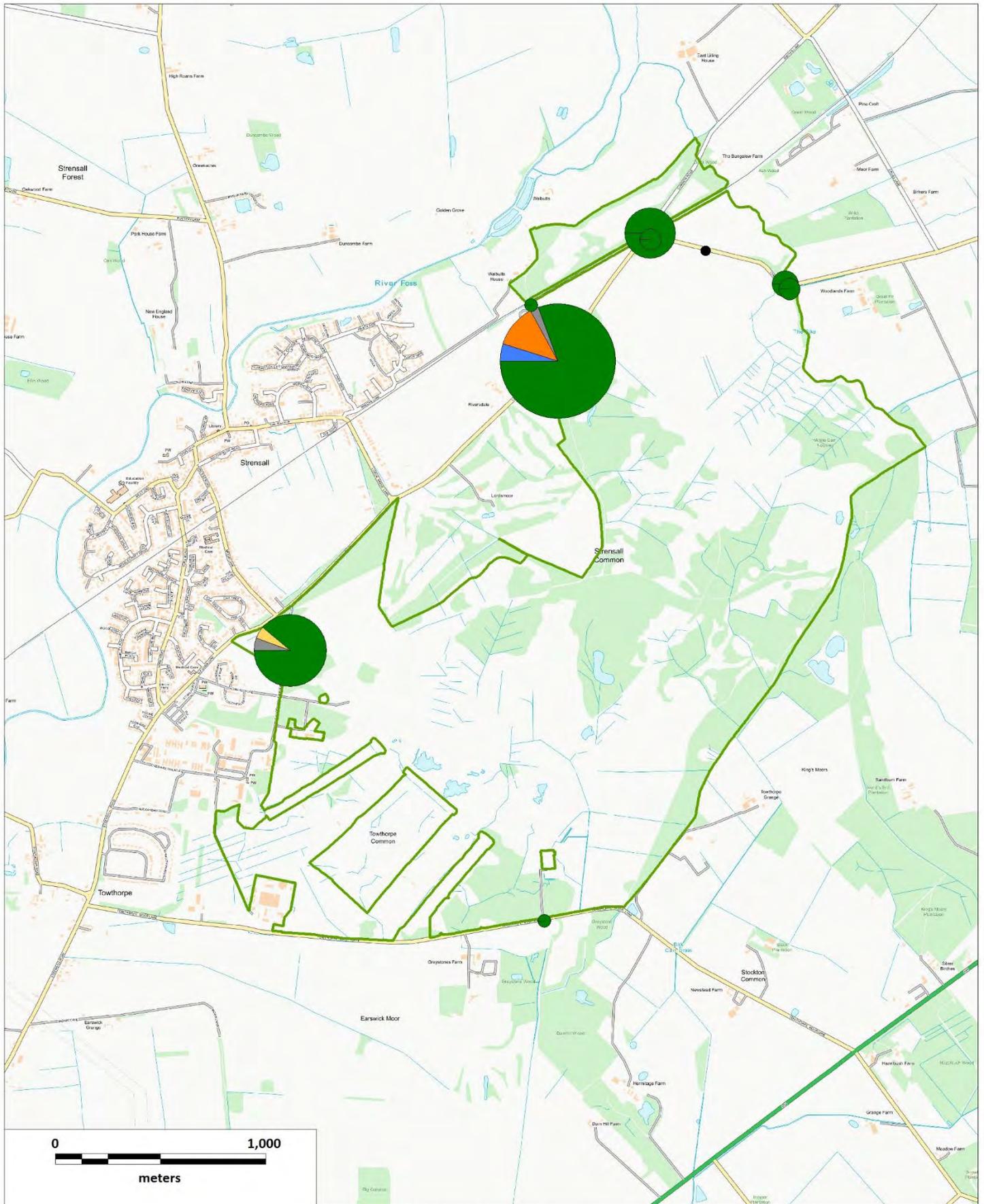
3.2 The results are shown spatially in Map 4. This shows that the majority of the parked vehicles were in the two main car-parks and that the Galtres car-park was the busiest. It was also the two main car-park where campervans, cars with bike racks, commercial vehicles and the branded dog walker vehicle 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 12th July and retrieved on the morning of the 30th July, giving a total of 17 full days of recording (13th-29th). In total 1007 images were logged, these were estimated from reviewing the images to involve 162 access events⁴. 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 25th July was particularly busy, the data showed a pulse of

⁴ 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 25th, the average number of events per day moving south was 5.6 and the number of events moving north was 3.3.

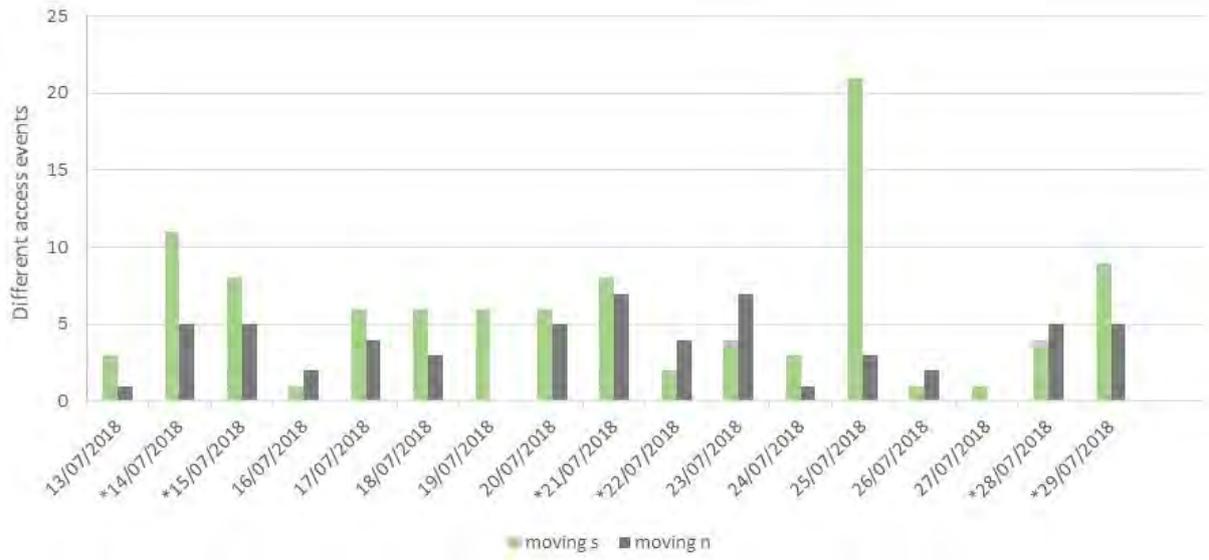


Figure 2: Day totals for counter 1 on the northern edge of the site. Asterisks by the date indicate weekends

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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
Total	3/12	16/33	5/1	16/20	5/4	3/2	0/3	11/28	59/103

Counter 2: eastern edge of the site

4.5 This camera was set up on the 31st July and left in situ until 12th September. During this time, it recorded over 3000 images. Images were scrutinised for the initial two weeks only, until the 12th 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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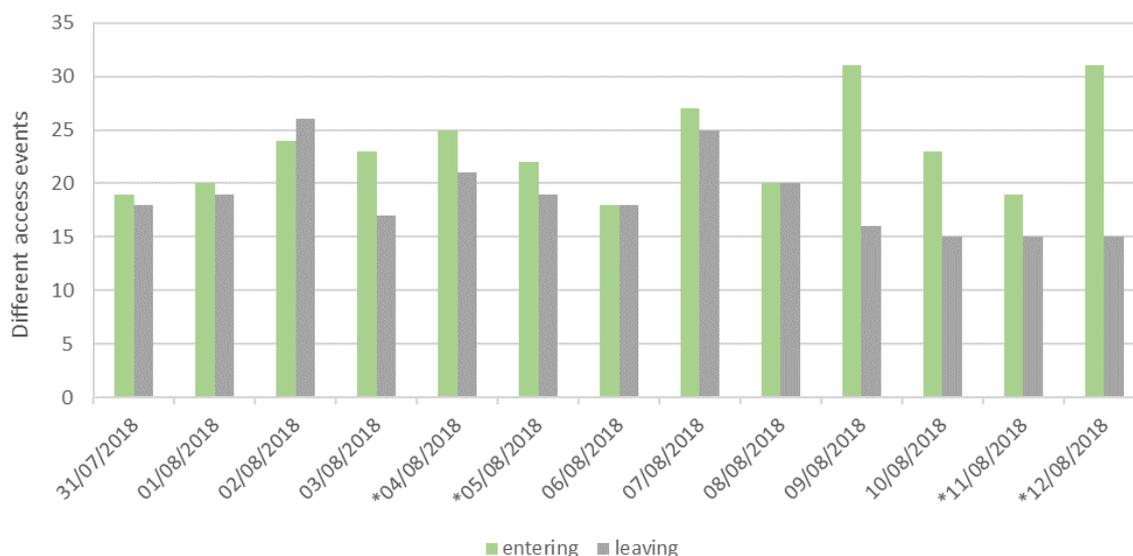


Figure 3: Day totals for counter 2 on the eastern edge of the site. Asterisks by the date indicate weekends. The camera was positioned near a gate into the site – entering is therefore people entering the common and heading south-east and leaving going in the opposite direction, towards the road.

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
Total	16/17	153/107	63/67	1/7	1/1	66/45	1/0	2/0	303/244

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		
Total		130	172	38	183	257	48	130	164	28

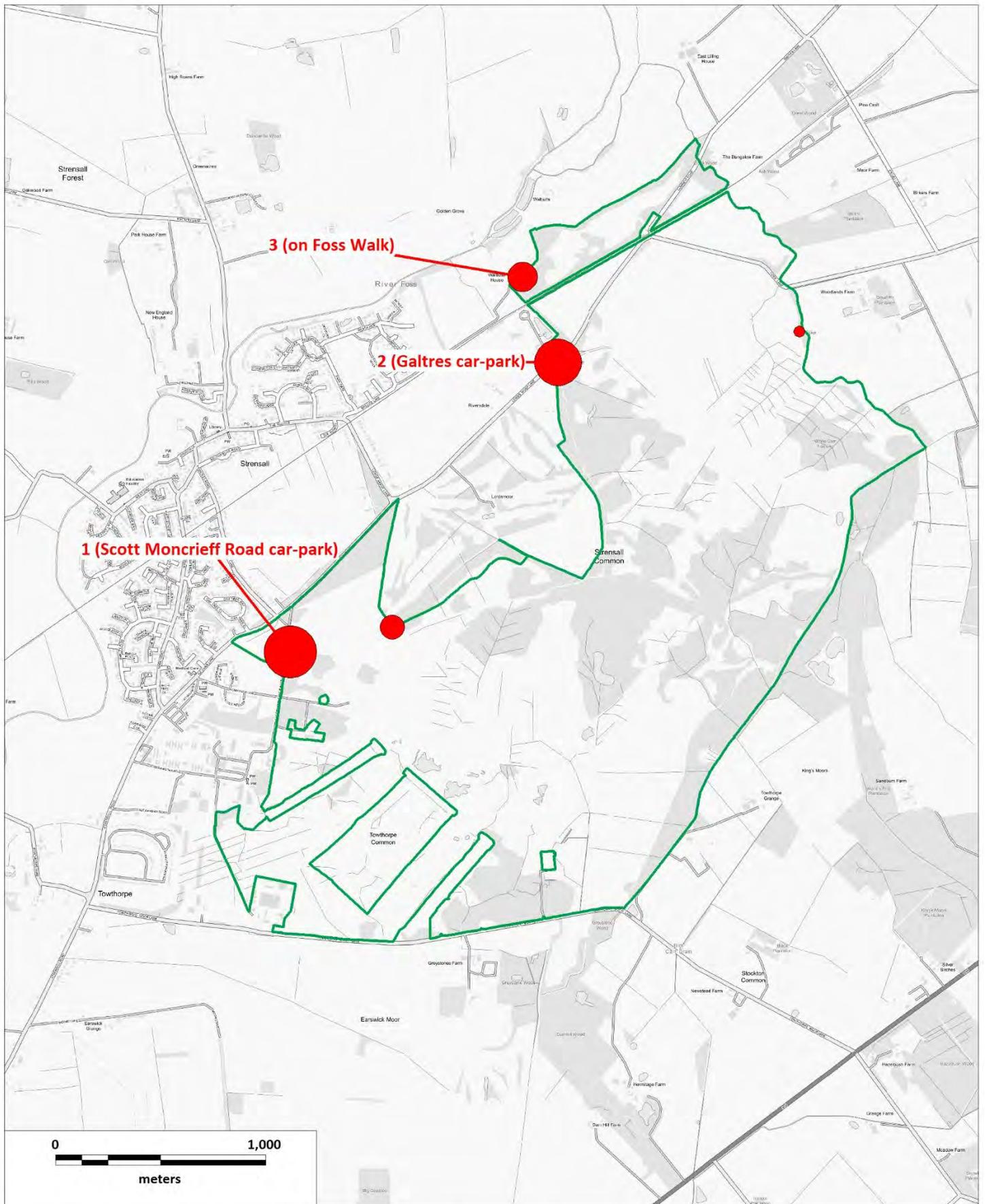
- 5.3 The Tally data give a total of 340 groups entering, involving 488 people counted and a total of 322 dogs, equivalent to 1.4 people and 0.9 dogs per group.
- 5.4 In Map 5 we show the tally data converted to an hourly rate and presented alongside the automated counter data. The size of the red circles 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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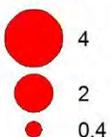
access events 'entering' (i.e. moving south in both cases) between 0700 and 1900 hours only. The total hours for each counter was the number of days multiplied by 12. These results suggest that the three interview locations had the largest visitor flow with 7.2 groups per hour entering at the Scott Moncrieff 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)	190 (95)
Day trip/short visit, staying away from home with friends/family	0 (0)	1 (1)	1 (1)	3 (2)	0 (0)	5 (3)
Staying away from home, e.g. second home, mobile home or on holiday	0 (0)	2 (1)	2 (1)	0 (0)	0 (0)	4 (2)
Total	70 (35)	32 (16)	49 (25)	17 (9)	31 (16)	199 (100)

- 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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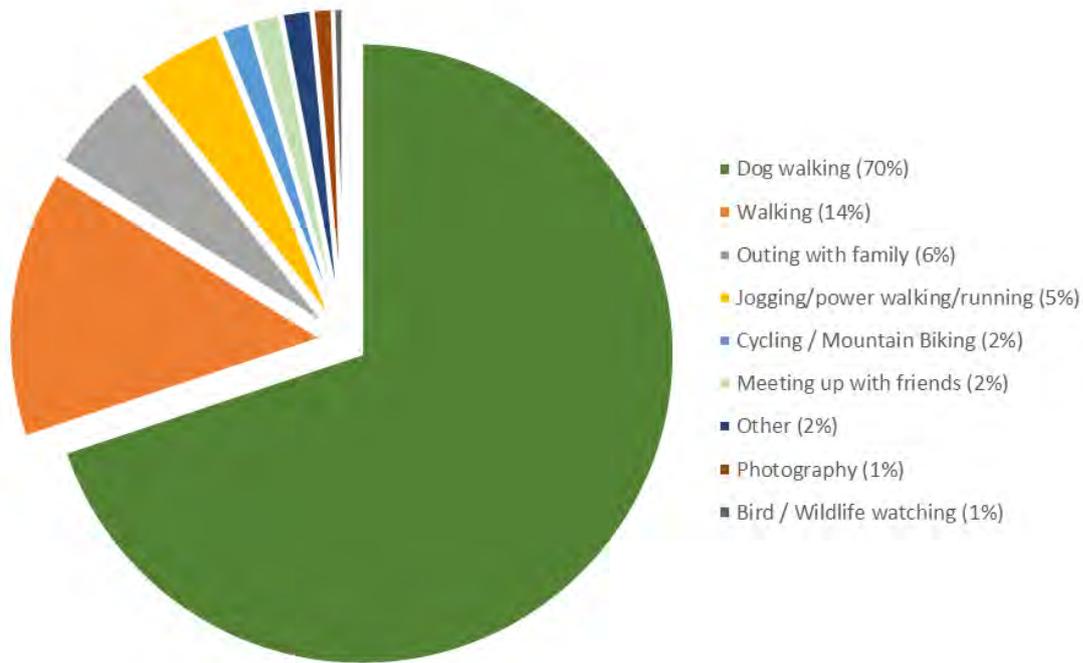


Figure 5: Activities undertaken (all 199 interviewees); from Q2.

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)	139 (70)
Walking	9 (11)	6 (35)	13 (13)	28 (14)
Outing with family	5 (6)	0 (0)	6 (6)	11 (6)
Jogging/power walking/running	3 (4)	1 (6)	5 (5)	9 (5)
Cycling/Mountain Biking	2 (2)	0 (0)	1 (1)	3 (2)
Meeting up with friends	2 (2)	0 (0)	1 (1)	3 (2)
Other	2 (2)	1 (6)	0 (0)	3 (2)
Photography	2 (2)	0 (0)	0 (0)	2 (1)
Bird/Wildlife watching	1 (1)	0 (0)	0 (0)	1 (1)
Total	81 (100)	17 (100)	101 (100)	199 (100)

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

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)	139 (100)
Walking	2 (7)	4 (14)	8 (29)	4 (14)	3 (11)	6 (21)	1 (4)	0 (0)	28 (100)
Outing with family	1 (9)	0 (0)	4 (36)	3 (27)	1 (9)	0 (0)	2 (18)	0 (0)	11 (100)
Jogging/power walking/running	1 (11)	2 (22)	5 (56)	1 (11)	0 (0)	0 (0)	0 (0)	0 (0)	9 (100)
Meeting with friends	1 (33)	0 (0)	1 (33)	0 (0)	0 (0)	1 (33)	0 (0)	0 (0)	3 (100)
Cycling/Mtn. Biking	1 (33)	1 (33)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (33)	3 (100)
Other	0 (0)	0 (0)	0 (0)	1 (33)	0 (0)	0 (0)	2 (67)	0 (0)	3 (100)
Photography	0 (0)	0 (0)	0 (0)	0 (0)	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Bird/Wildlife watching	0 (0)	0 (0)	1 (100)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (100)
Total	64 (32)	36 (18)	47 (24)	15 (8)	11 (6)	14 (7)	10 (5)	2 (1)	199 (100)

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)
Total	41 (21)	104 (52)	45 (23)	6 (3)	3 (2)	199 (100)

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 - 4 pm)	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)
Total	11 (6)	42 (21)	30 (15)	16 (8)	30 (15)	23 (12)	86 (43)	10 (5)	199 (100)

- 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%).

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 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)
Total	24 (12)	16 (8)	25 (13)	17 (9)	156 (78)	10 (5)	199 (100)

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)
Total	7 (4)	7 (4)	18 (9)	27 (14)	27 (14)	102 (51)	10 (5)	199 (100)

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.

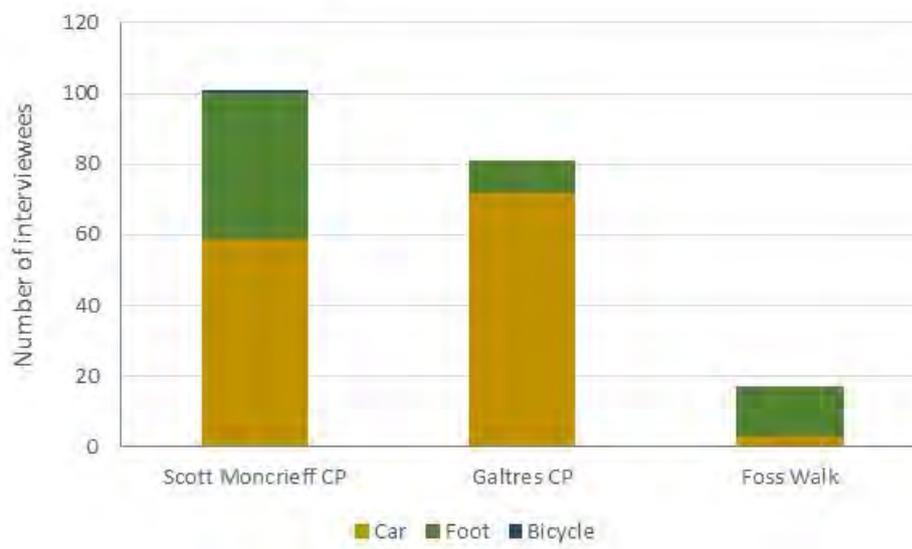


Figure 6: Numbers of interviewees by mode of transport (Q8) and survey point.

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)
Total	72 (89)	9 (11)	3 (18)	14 (82)	1 (1)	59 (58)	41 (41)
Survey point total	81 (100)		17 (100)		101 (100)		

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.

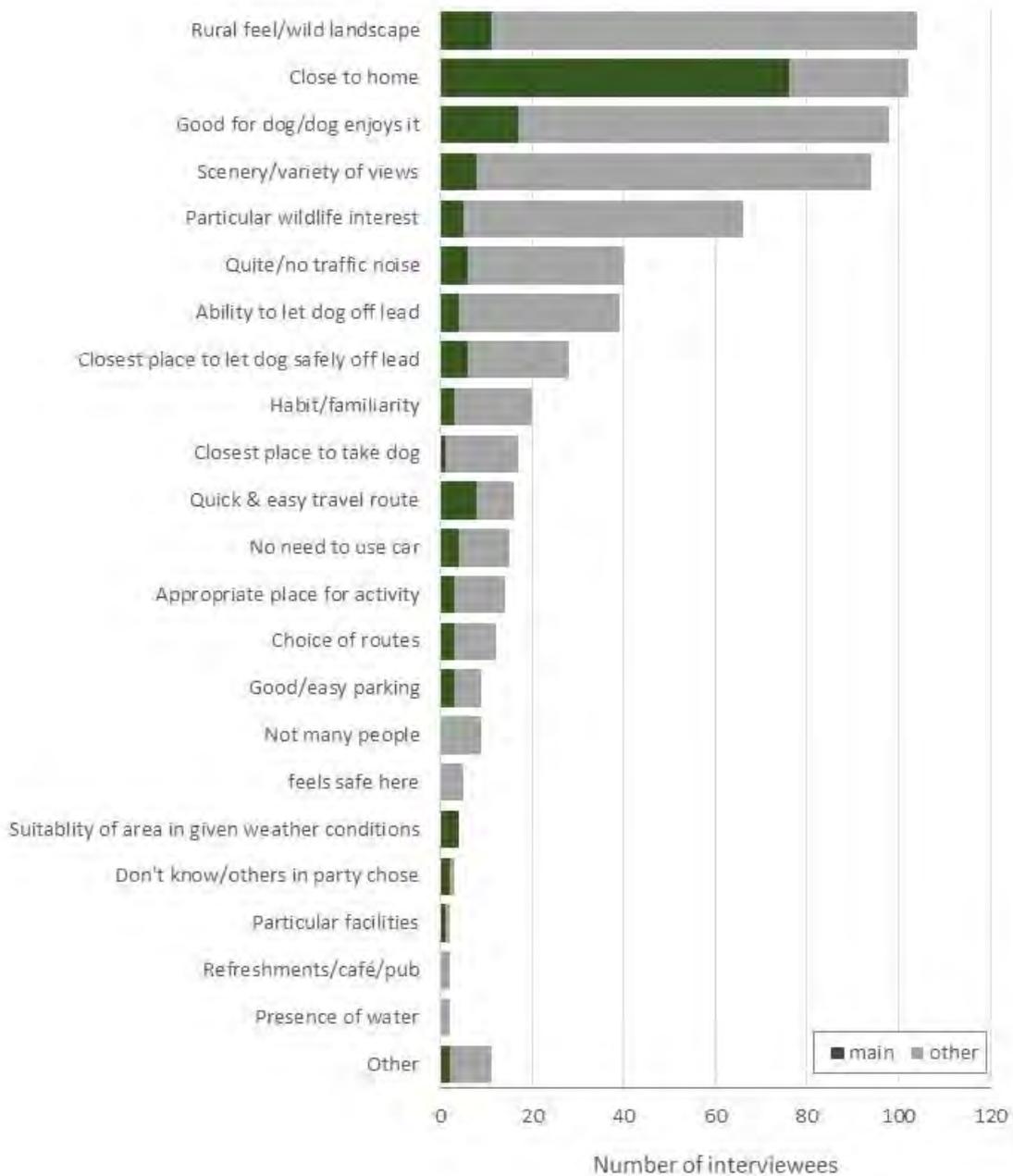


Figure 7: Reasons for site choice (Q13).

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)
Total	50 (25)	63 (32)	27 (14)	16 (8)	30 (15)	12 (6)	199 (100)



Figure 8: Word cloud giving other sites given by interviewees (from Q15). Graphic created using the [Wordle](#) app.

Table 16: Other sites visited, named by at three or more interviewees

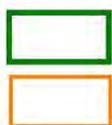
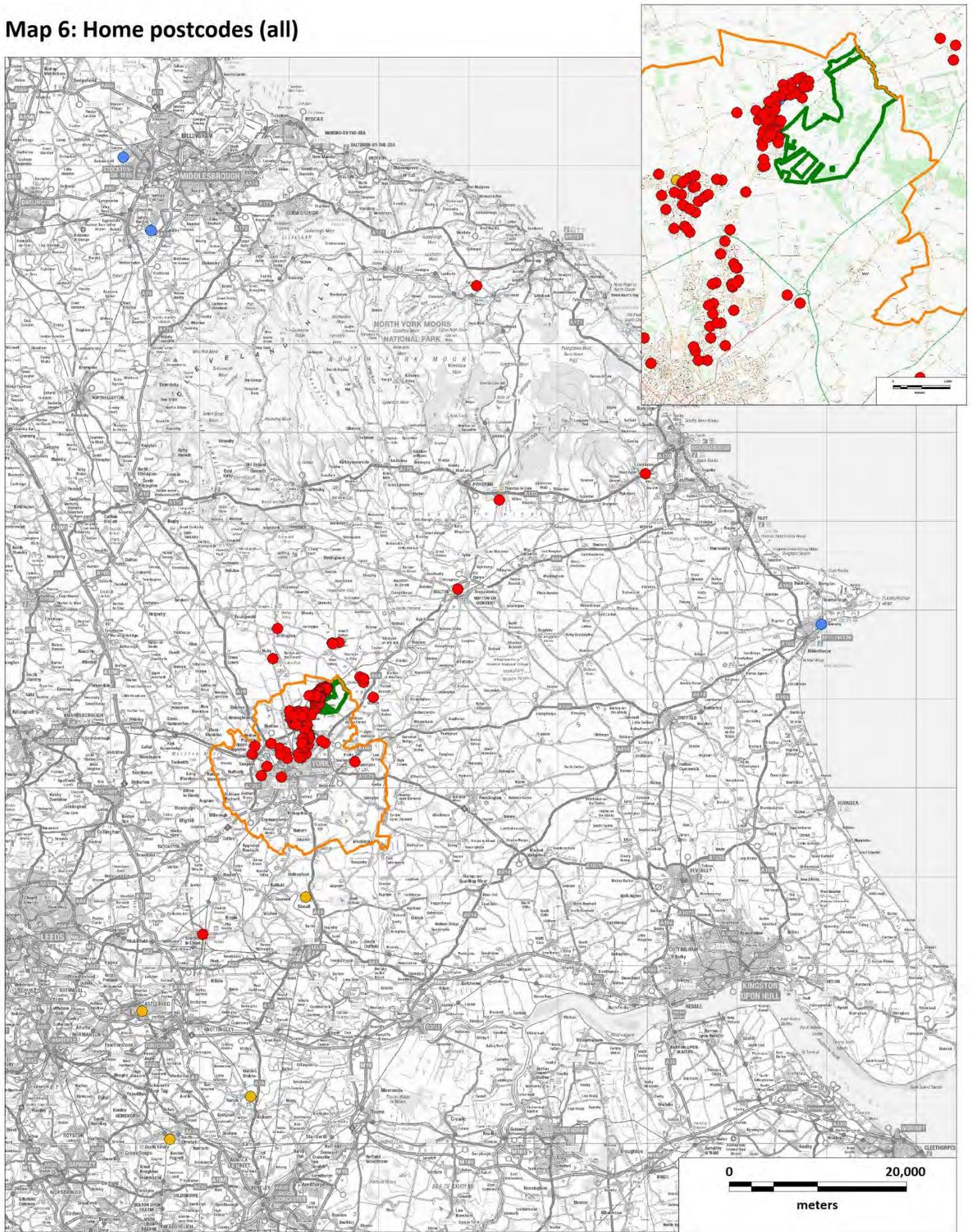
Site name	Number of interviewees
River Foss	38
Huntington	9
Strensall Village	8
Haxby	6
Castle Howard	5
Earswick	5

Site name	Number of interviewees
'Around village'	5
Wiggington	3
'the Common'	3
Dalby Forest	3
Rawcliffe	3

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)



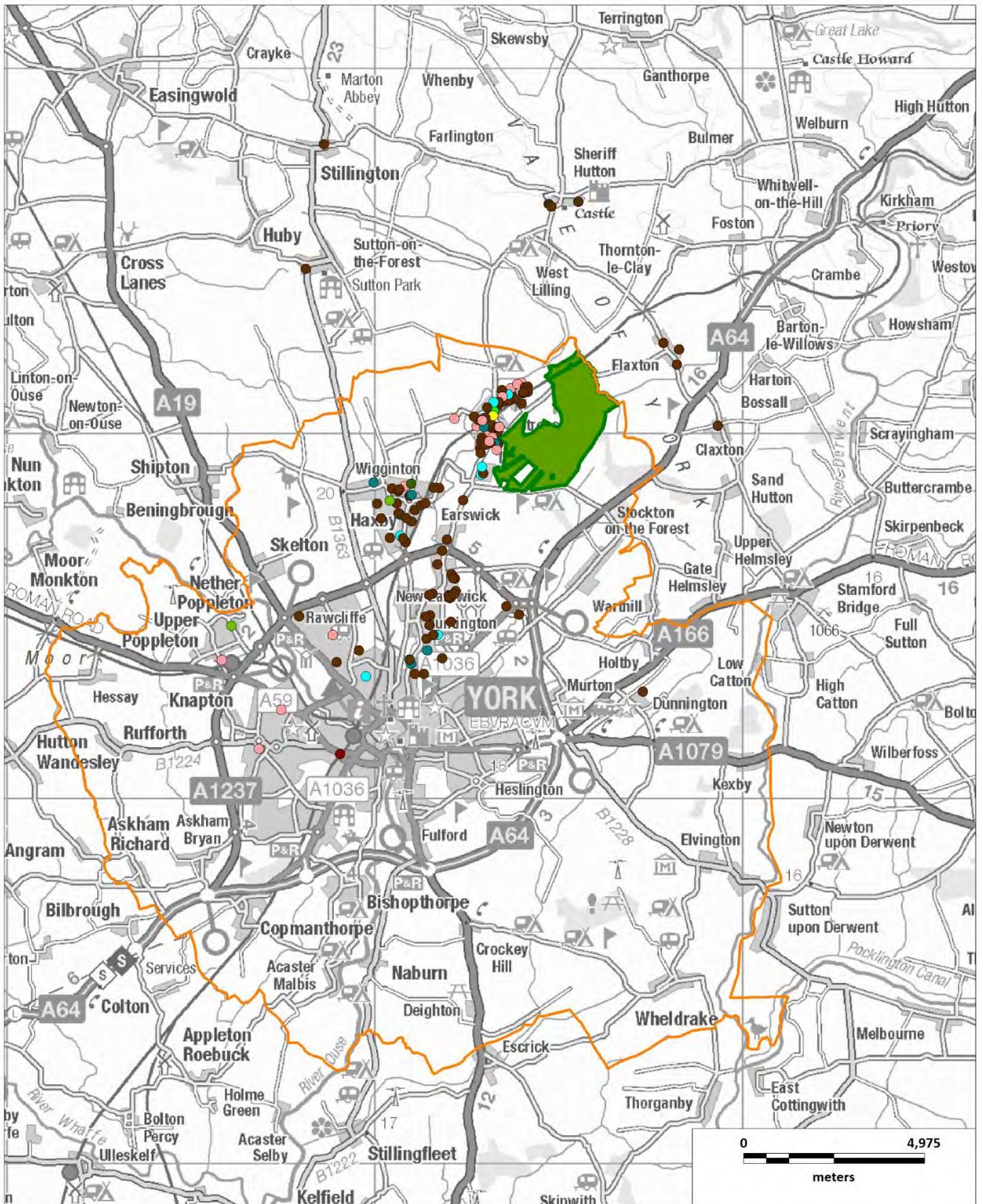
Strensall Common SAC

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)

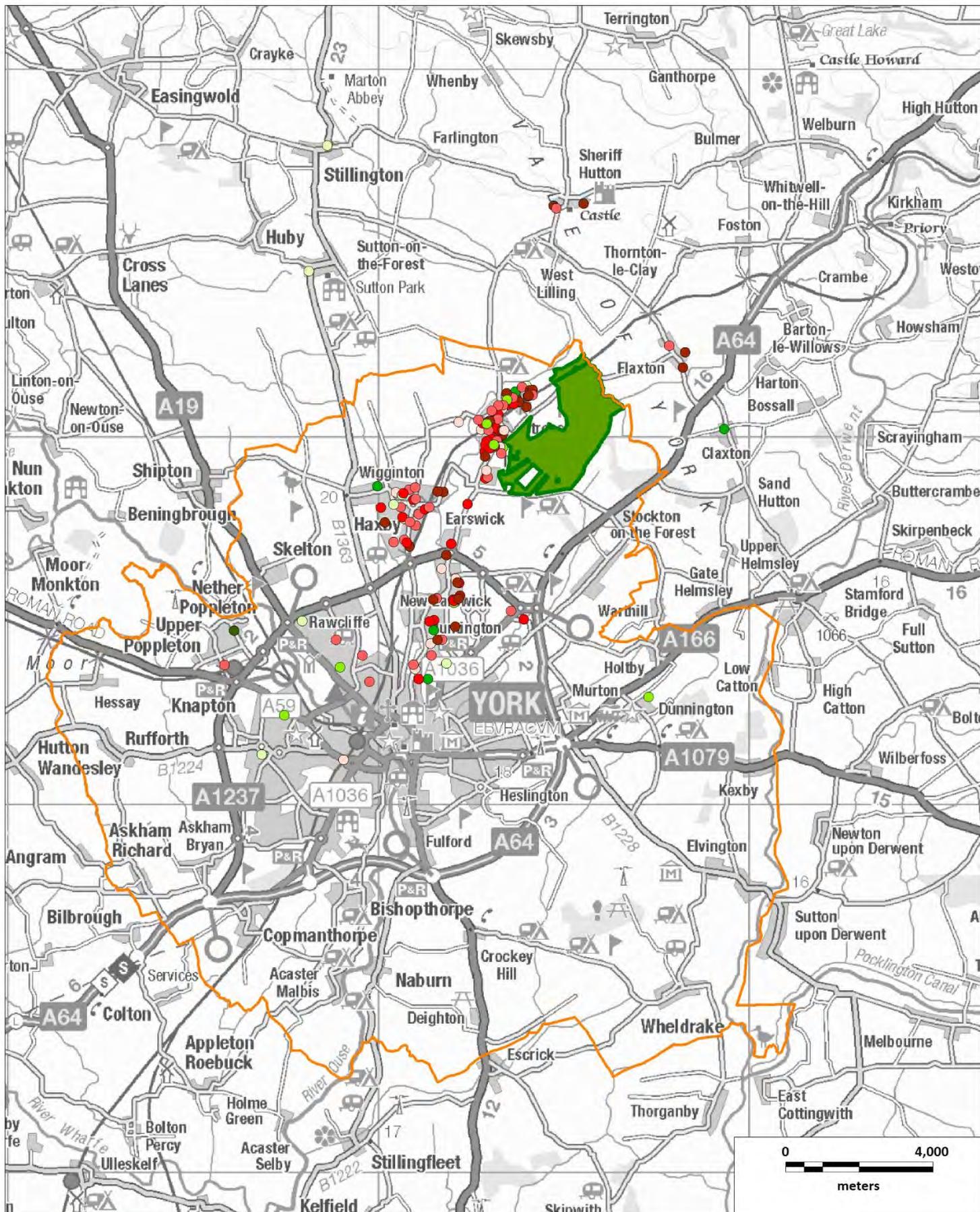
Map 7: Home postcodes by activity (10 postcodes lie outside mapped area)



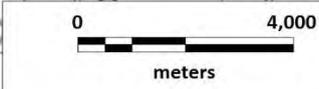
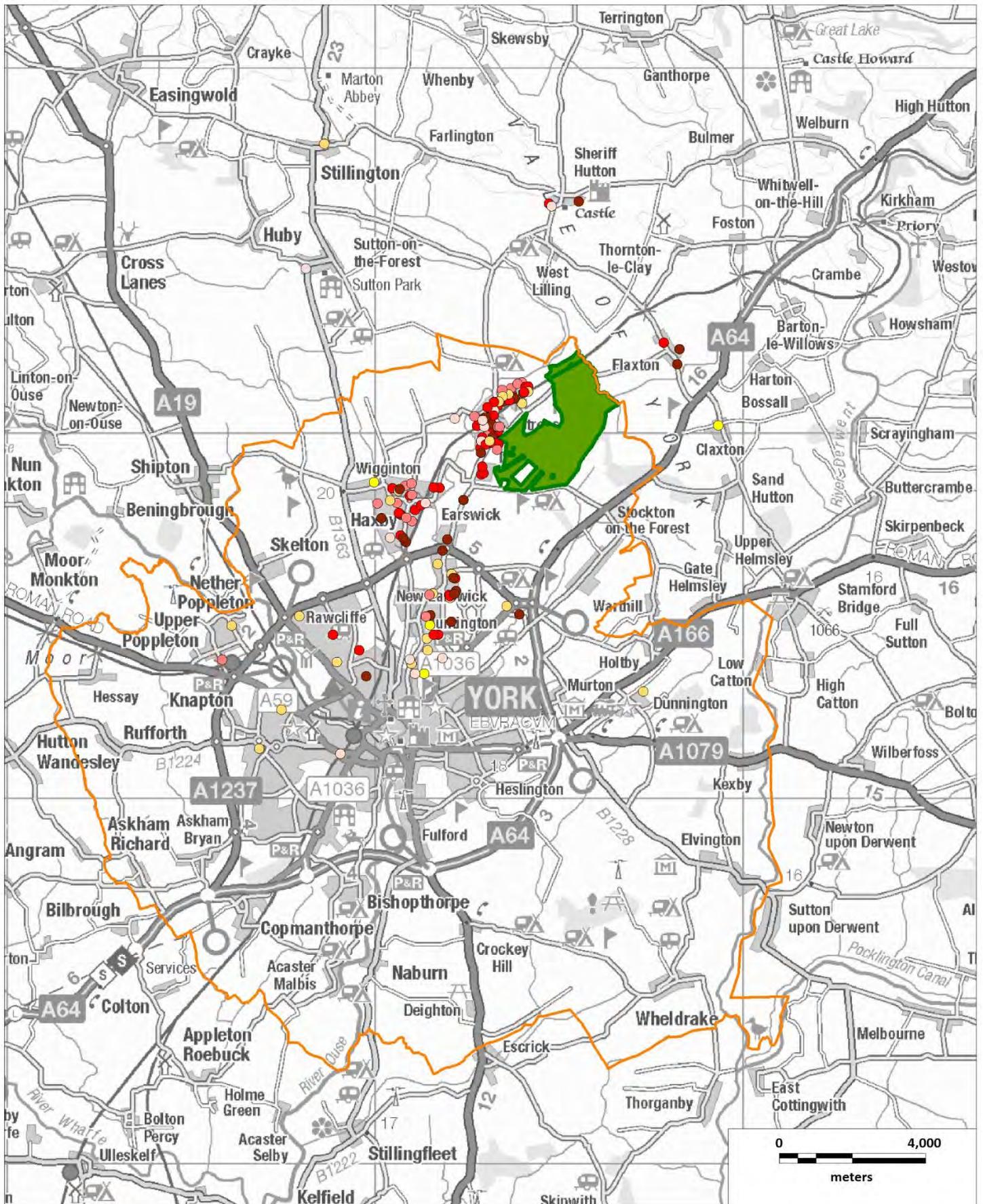
Interviewee postcodes by main_activity

	Strensall Common SAC		Bird / Wildlife watching	(1)		Other	(2)
	City of York		Cycling / Mountain Biking	(3)		Outing with family	(10)
			Dog walking	(134)		Photography	(2)
			Jogging / power walking / running	(9)		Walking	(28)
			Meeting up with friends	(3)			

Map 8: Home postcodes by frequency of visit (10 postcodes lie outside mapped area)



Map 9: Home postcodes & percentage of visits to Strensall Common
 (10 postcodes lie outside mapped area)

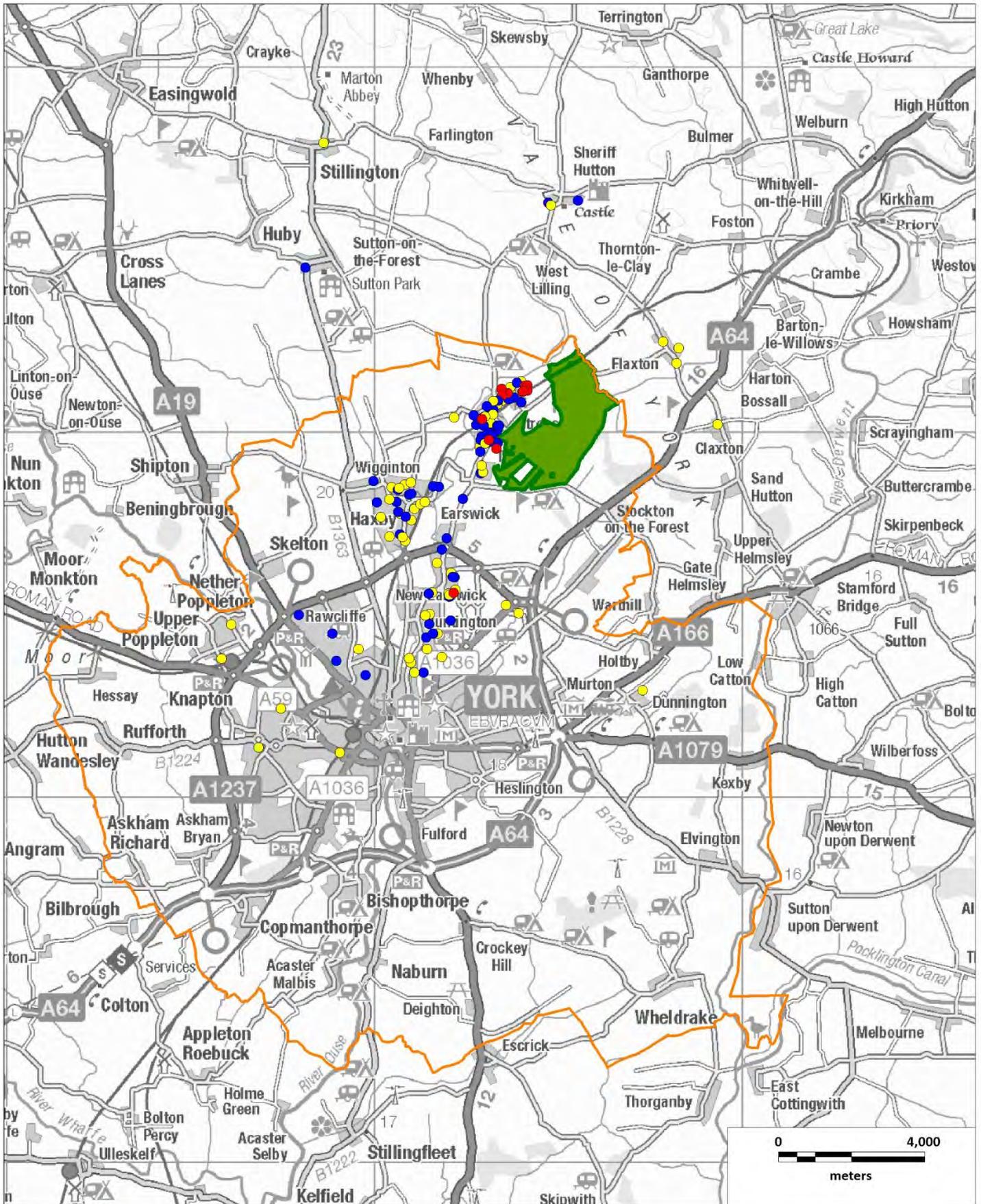


Strensall Common SAC
 City of York

Interviewee postcodes and percentage of visits for given activity to Strensall Common

● All take place here (49)	○ 25-49% (16)
● 75% or more (61)	○ less than 25% (28)
● 50-74% (26)	○ Not sure/don't know/first visit (11)

Map 10: Home postcodes by survey point (10 postcodes lie outside mapped area)



- | | | |
|-------------------------------------------------------------------------------------|----------------------|------------------------------------------------------------------------------------------------------------------------|
|  | Strensall Common SAC | Interviewee postcodes by survey point |
|  | City of York |  Galtres car-park (78) |
| | |  On Foss Walk (17) |
| | |  Scott Moncrieff Road car-park (97) |

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 (75th 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 75th 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 75th 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).

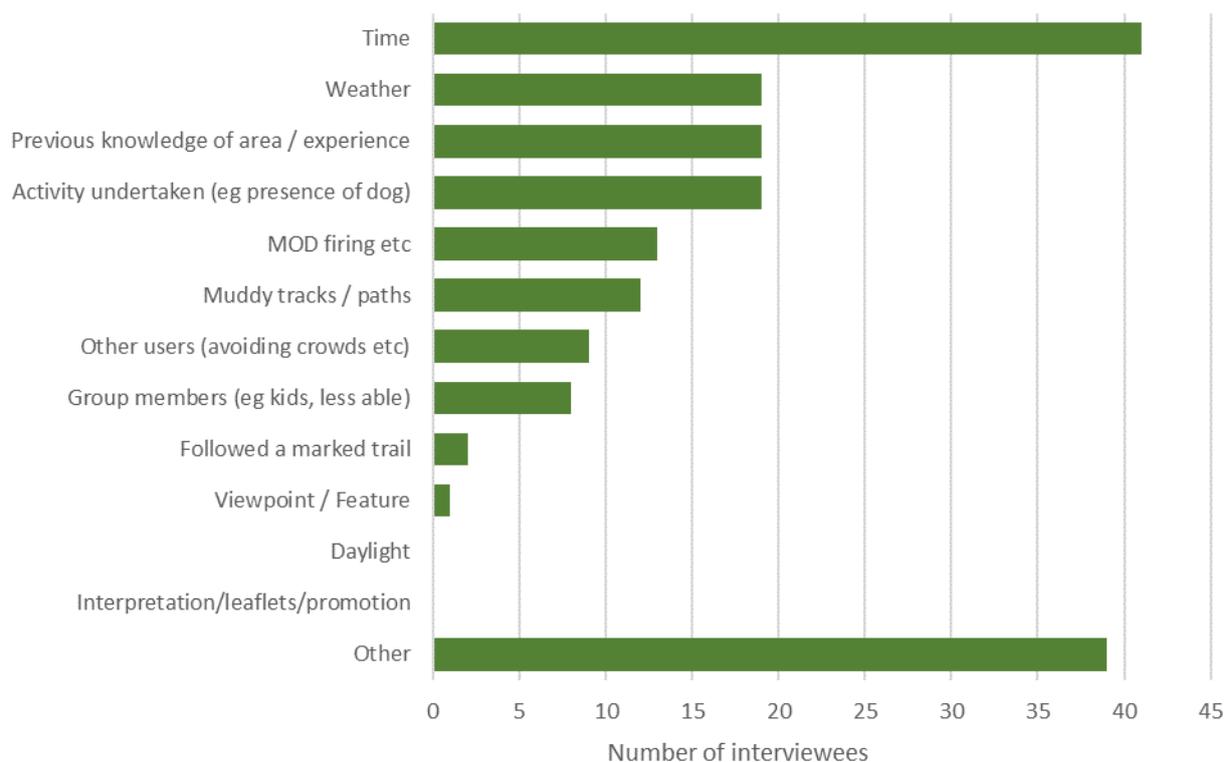


Figure 9: Factors influencing choice of route (Q12). Note interviewees could give multiple responses.

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.

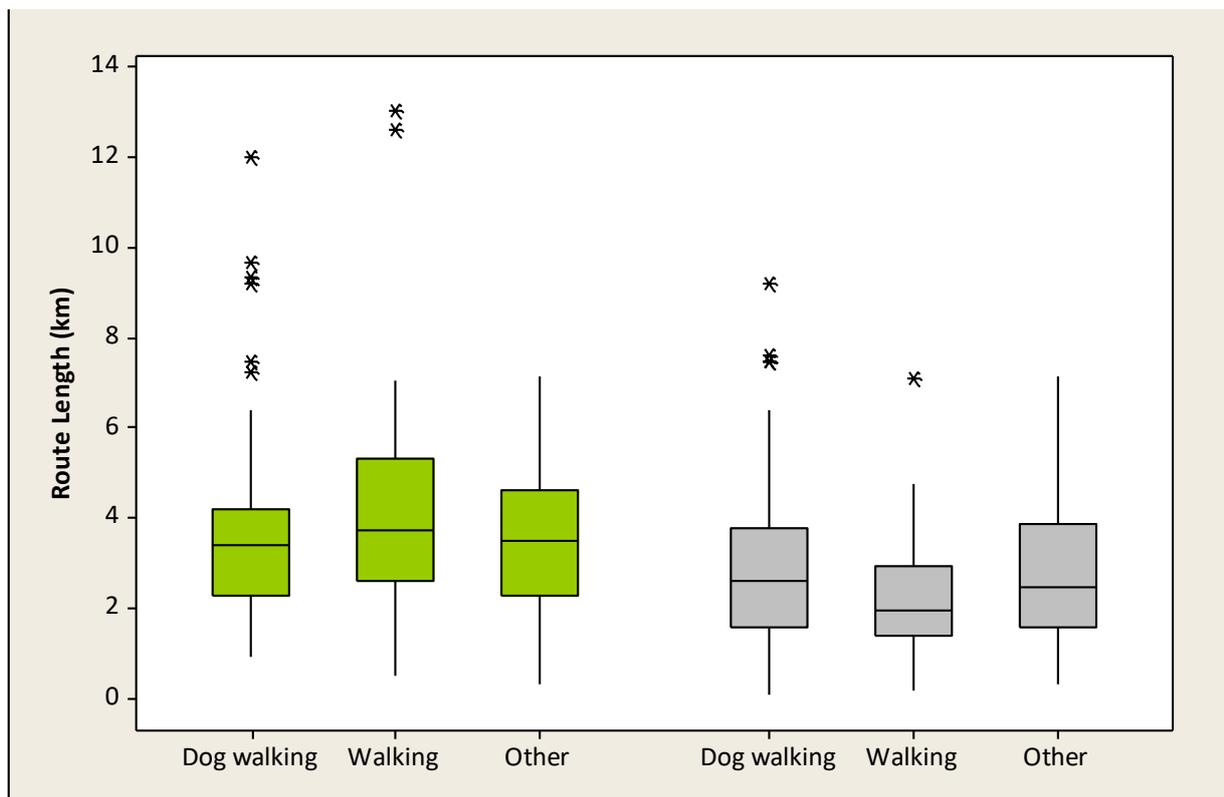
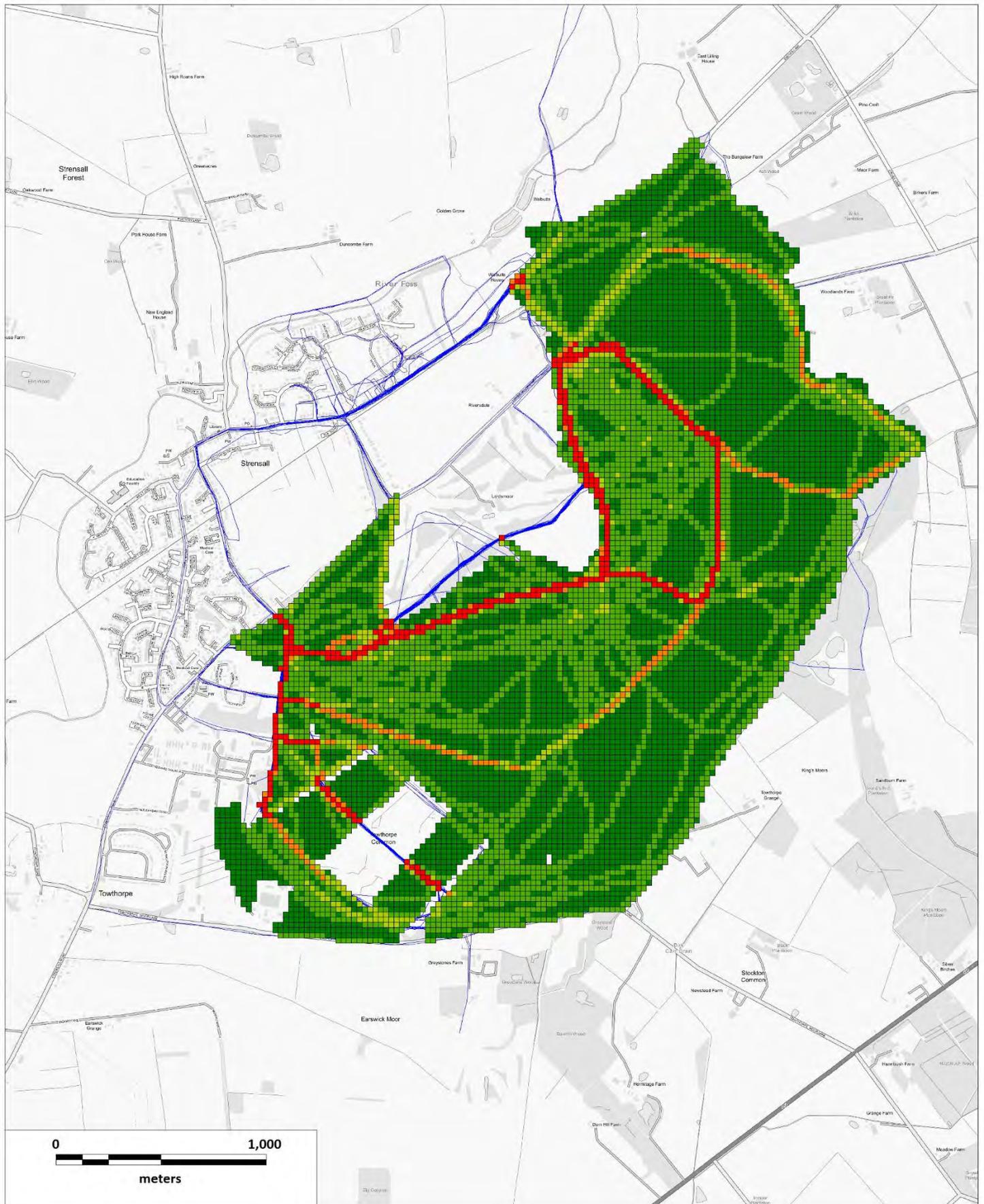


Figure 10: Box plot showing route lengths by selected activities. Green shading reflects total routes mapped, grey shading routes clipped to within the SAC only. Horizontal lines show the median, boxes show the inter-quartile range, whiskers reflect the limit of the data and the asterisks show outliers.

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
Total	48,919	6653	14	174	

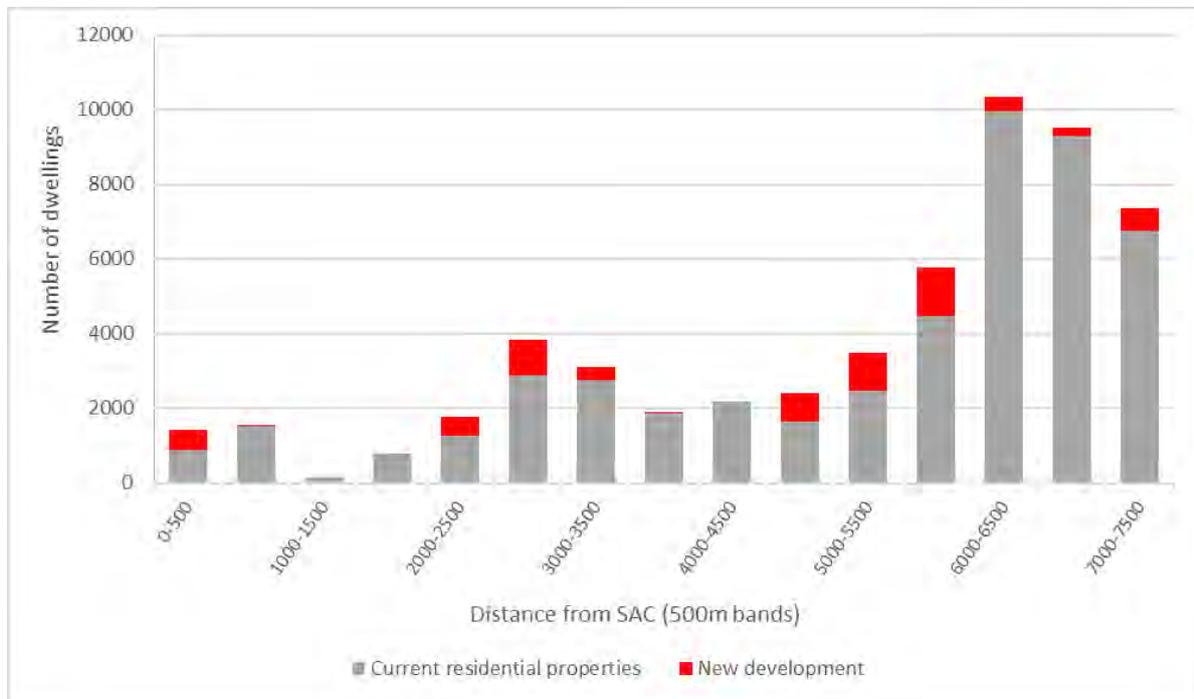


Figure 12: Levels of current and future (new) housing. Current residential properties are extracted from 2017 postcode data. New development is that shown in Map 2, i.e. plan allocations.

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.

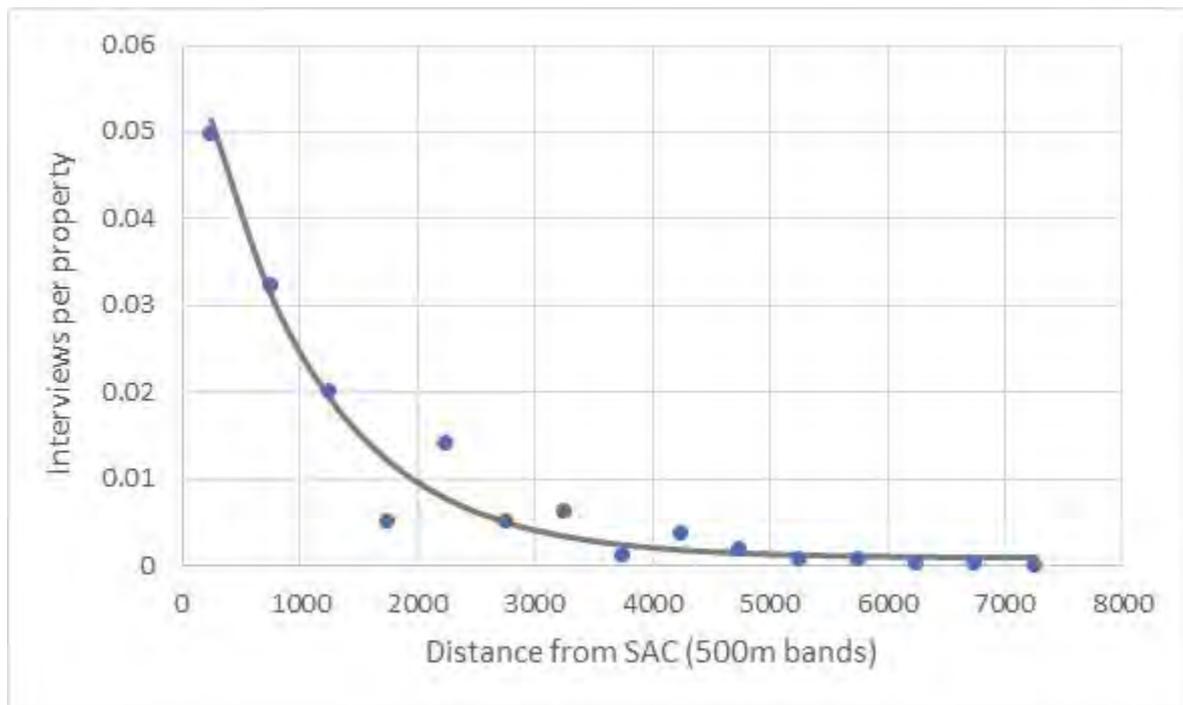


Figure 13: Interviews per property in relation to distance from the SAC. Interviews per property is calculated by dividing the number of interviewees who originated in each 500m band by the number of residential properties in the band. Trendline fitted manually by eye. $Y=0.065e^{-0.001x} + 0.0008$. $r^2 = 0.962$.

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	
	174	42.16	24

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

- 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.

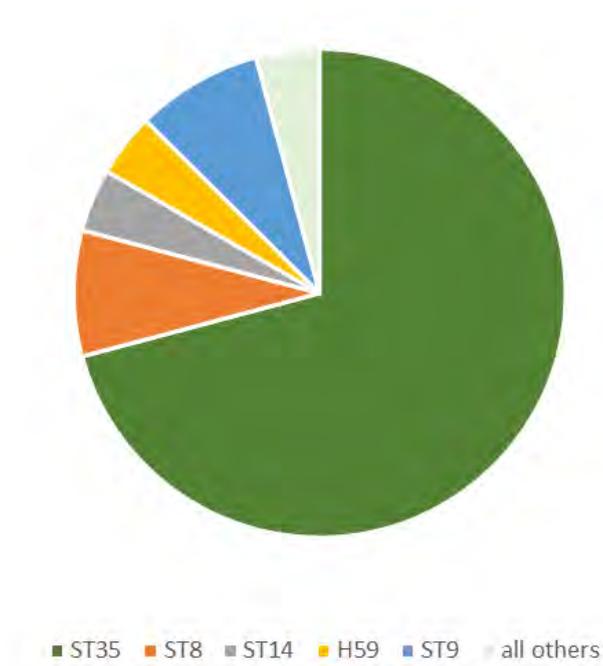


Figure 14: Relative contribution of different allocation sites (all within 7.5km of Strensall Common) to the change in access predicted from the overall quantum of development. The overall change is an increase of 24%.

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 habitats⁵ for which the site is designated. UKHab was used (as opposed to Phase 1⁶) 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 description⁷ 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**

⁵ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUcode=UK0030284>

⁶ <http://jncc.defra.gov.uk/page-4258>

⁷ <http://jncc.defra.gov.uk/protectedsites/sacselection/habitat.asp?FeatureIntCode=H4030>

heathland with Cross-leaved Heath, lowland⁸ 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 poor 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,

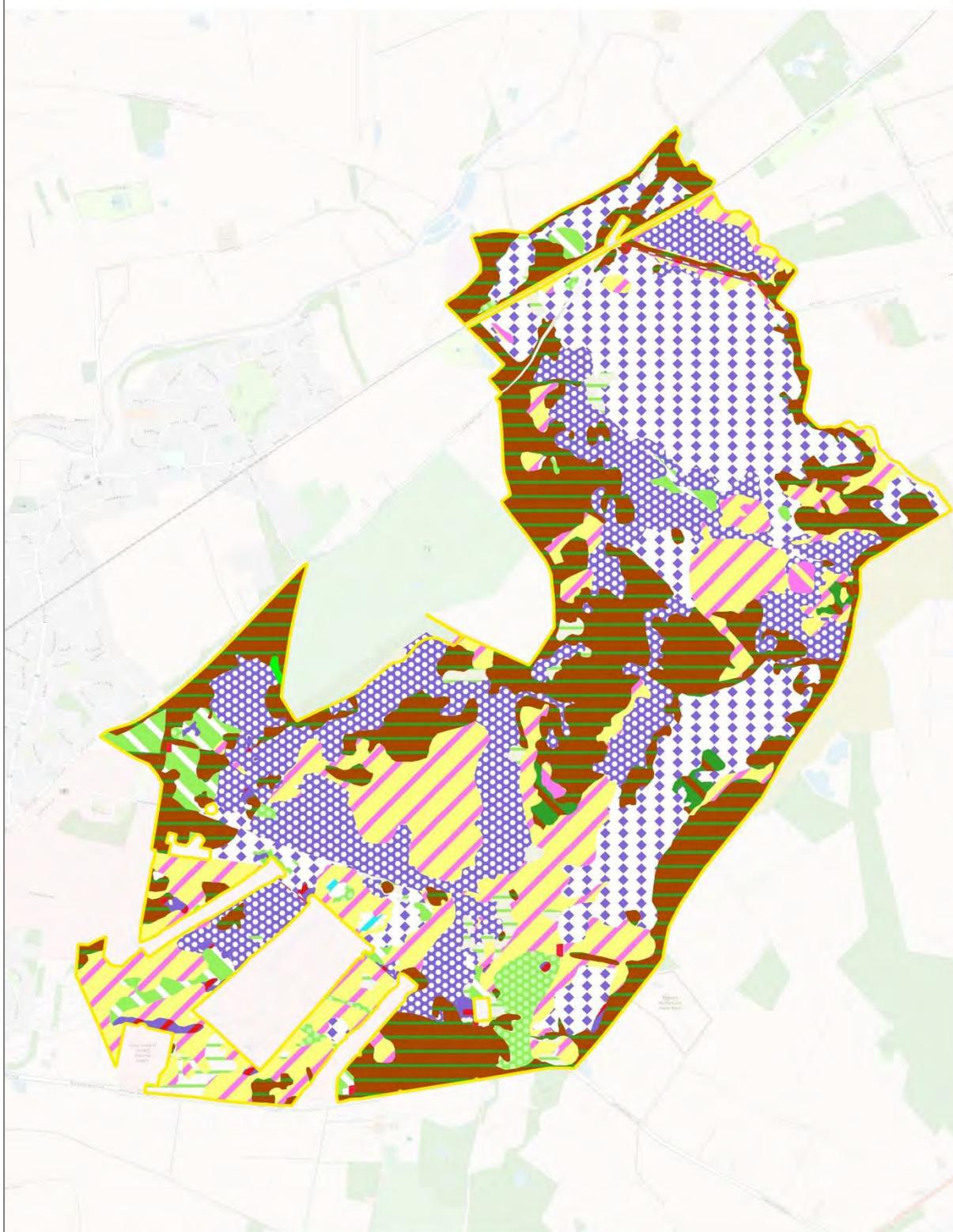
⁸ The UKHab correspondence table suggests that H9e can fall within h1b6 Wet heathland with cross-leaved heath; upland, but clearly it is lowland heathland at Strensall.

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**.

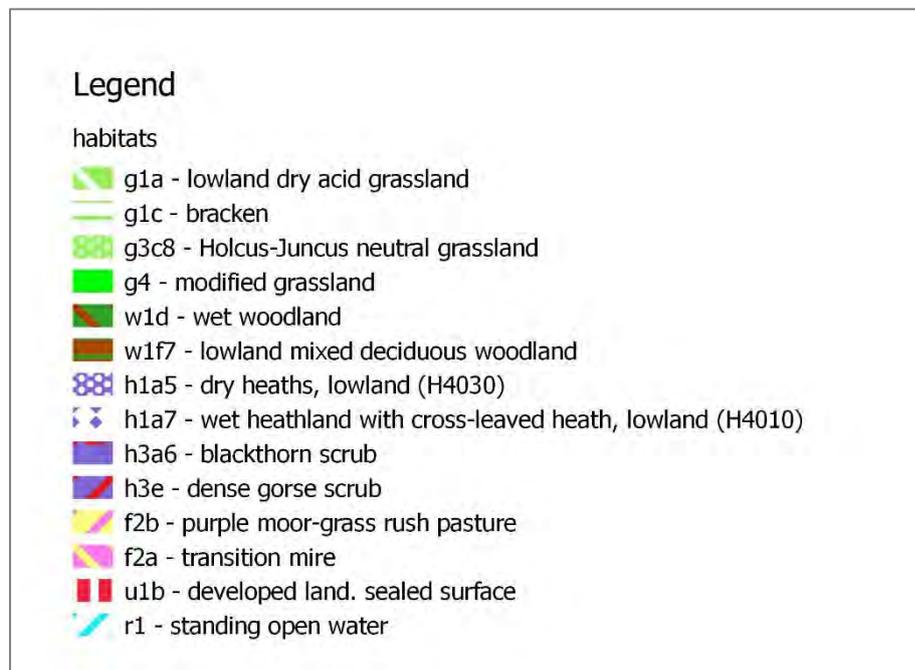
Visitor surveys and impacts of recreation at
Strensall Common

Map 12: Strensall Common habitat map



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Visitor surveys and impacts of recreation at Strensall Common



- 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 Plan⁹ 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

⁹ 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

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

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 possibly 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

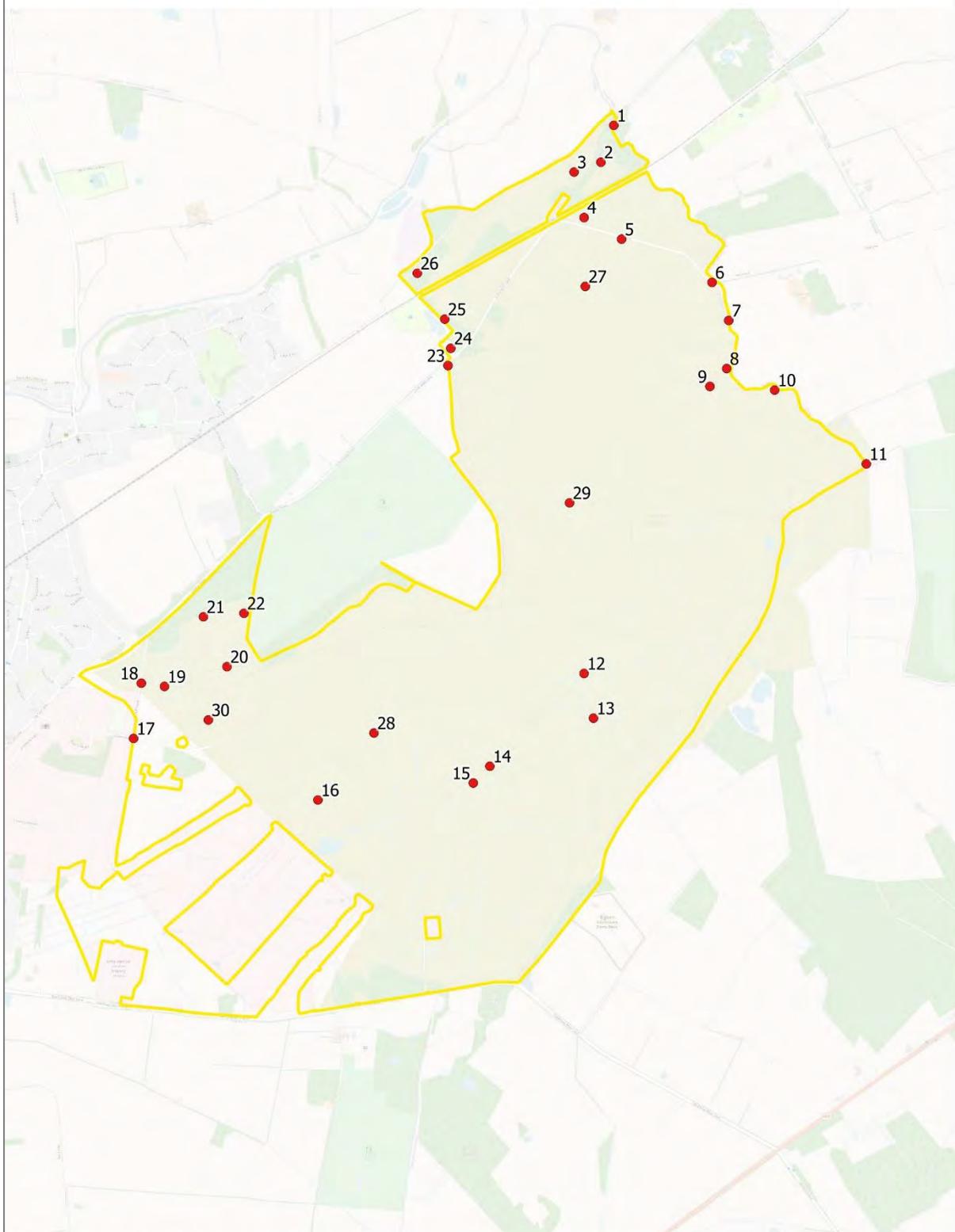
- 9.44 Damage to infrastructure can occur in a variety of ways. With more footfall, infrastructure such as car-parks, paths, gates and stiles are likely to need more maintenance and repair. Direct damage can also occur through vandalism.
- 9.45 While not fundamental to the SAC interest, where infrastructure 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).

Visitor surveys and impacts of recreation at
Strensall Common

Map 13: Target notes relating to recreational pressure at Strensall Common



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Visitor surveys and impacts of recreation at
Strensall Common

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

Visitor surveys and impacts of recreation at Strensall Common



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).

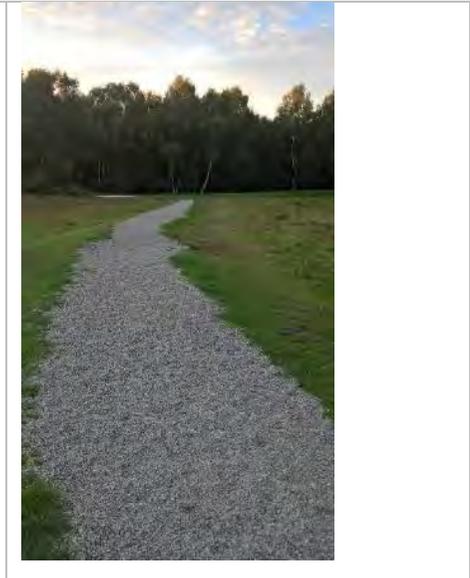


Lightly-used path parallel with road in northern section of common (TN4).



Broad path along main boundary drain on eastern edge of site appears well used but with little bare ground (TN10).

Visitor surveys and impacts of recreation at Strensall Common

			
<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

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

mitigation. For example, at Talbot Heath in Dorset a planning appeal¹⁰ 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;

¹⁰ Application by talbot village trust (tvt) application ref: 00/08824/084/P land south of Wallisdown Road, Poole, Dorset

- 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.

- 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

- Baker, D., Barrett, S., Beale, C.M., Crawford, T.J., Ellis, S., Gullett, T., Mayhew, P.J., Parsons, M.S., Relf, P., Robertson, P., Small, J. & Wainwright, D. (2016) Decline of a Rare Moth at Its Last Known English Site: Causes and Lessons for Conservation. *PLOS ONE*, **11**, e0157423.
- Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, **11**, 16–19.
- Bayfield, N.G. & Aitken, R. (1992) *Managing the Impacts of Recreation on Vegetation and Soils: A Review of Techniques*. INSTITUTE OF TERRESTRIAL ECOLOGY (Natural Environment Research Council).
- Bayfield, N.G. & Brookes, B.S. (1979) Effects of repeated use of an area of heather *Calluna vulgaris* (L.) hull moor at Kindrogan, Scotland, for teaching purposes. *Biological Conservation*, **16**, 31–41.
- Bell, J., Wheeler, C. & Cullen, W. (2001) The implications of grassland and heathland management for the conservation of spider communities: A review. *Journal of the Zoological Society of London*, **255**, 377–387.
- Bull, S.E. (1998) *The Impact of Dogs on National Trust Properties*. Estates Dept., National Trust, Cirencester.
- Byfield, A. & Pearman, D. (1996) *Dorset's Disappearing Flora. Changes in the Distribution of Dorset's Rarer Heathland Species 1931 to 1993*. Plantlife.
- Currall, J. (1981) *Some Effects of Management by Fire on Wet Heath Vegetation in Western Scotland*. PhD Thesis, Aberdeen, University of Aberdeen.
- Denton, J. & Groome, G. (2017) Dogs and ponds: a case study from Headley Heath. *Conservation Land Management*, **15**, 4–8.
- Gallet, S. & Roze, F. (2001) Conservation of heathland by sheep grazing in Brittany (France): Importance of grazing period on dry and mesophilous heathlands. *Ecological Engineering*, **17**, 333–344.
- Gough, M.W. & Marrs, R.H. (1990) A comparison of soil fertility between semi-natural and agricultural plant communities: Implications for the creations of species-rich grassland on abandoned agricultural land. *Biological Conservation*, **51**, 83–96.
- Groome, G., Denton, J. & Smith, P. (2018) *The Impact of Dogs on the Environment*. CIEEM.
- Harrison, C. (1981) Recovery of lowland grassland and heathland in southern England from disturbance by seasonal trampling. *Biological Conservation*, **19**, 119–130.

Visitor surveys and impacts of recreation at
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- Holden, J., Chapman, P., Evans, M., Hubacek, K., Kay, P. & Warburton, J. (2007) *Vulnerability of Organic Soils in England and Wales*. DEFRA and CCW.
- Horton, A.A., Walton, A., Spurgeon, D.J., Lahive, E. & Svendsen, C. (2017) Microplastics in freshwater and terrestrial environments: Evaluating the current understanding to identify the knowledge gaps and future research priorities. *Science of The Total Environment*, **586**, 127–141.
- Kerney, M.P. (1999) *Atlas of the Land and Freshwater Molluscs of Britain and Ireland*. Harley Books, Colchester.
- Key, R. (2000) Bare ground and the conservation of invertebrates. *British Wildlife*, **11**, 183–192.
- Kirby, P. (2001) *Habitat Management for Invertebrates: A Practical Handbook*. Royal Society for the Protection of Birds, Sandy.
- Kirby, J.S. & Tantram, D.A.S. (1999) *Monitoring Heathland Fires in Dorset: Phase 1*.
- Kuss, F.R. & Morgan, J.M. (1984) Using the USLE to estimate the physical carrying capacity of natural areas for outdoor recreation planning. , **39**, 383–387.
- Lake, S., Bullock, J. & Hartley, S. (2001) *Impacts of Livestock Grazing on Lowland Heathland in the UK*. English Nature, Peterborough.
- Lake, S. & Underhill-Day, J. (1999) Effects of grazing on heathland flora. *International seminar on heathland management in north west Europe. Programme Life 'Gestion des lands du nord ouest l'Europe'*, pp. 150–158. Bretagne Vivante/SEPNB.
- Liddle, M.J. (1997) *Recreation Ecology*. Chapman & Hall, London.
- Liley, D., Lake, S., Underhill-Day, J., Sharp, J., White, J., Hoskin, R., Cruickshanks, K. & Fearnley, H. (2010) *Welsh Seasonal Habitat Vulnerability Review*. Footprint Ecology / CCW.
- Lowen, J., Liley, D., Underhill-Day, J. & Whitehouse, A.T. (2008) Access and Nature Conservation Reconciliation: supplementary guidance for England.
- MacIntyre, M. (1991) *The Effects of Walking and Mountain Bike Use on the Erosion of Open Heather Moorland*. Aberdeen Centre for Land Use, Aberdeen.
- Mallord, J.W., Dolman, P.M., Brown, A.F. & Sutherland, W.J. (2007) Linking recreational disturbance to population size in a ground-nesting passerine. *Journal of Applied Ecology*, **44**, 185–195.
- Miller, G. & Miles, J. (1984) *Moorland Management: A Study of Exmoor*. Institute of Terrestrial Ecology, Banchory.

Visitor surveys and impacts of recreation at
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- Murison, G. (2002) *The Impact of Human Disturbance on the Breeding Success of Nightjar *Caprimulgus Europaeus* on Heathlands in South Dorset, England*. English Nature, Peterborough.
- Panzer, R. (2002) Compatability of prescribed burning with the conservation of insects in small, isolated prairie reserves. *Conservation Biology*, **16**, 1296–1307.
- Rawes, M. & Hobbs, R. (1979) Management of semi-natural blanket bog in the Northern Pennines. *Journal of Ecology*, **67**, 789–807.
- Rees, S.L. (1990) *The Effects of Trampling on Grassland Area, Brathens, Scotland an Assessment of the Relative Impact of Plimsols, Walking Boots and a Mountain Bike and a Comparison of Two Different Moisture Levels*. University of Leicester,.
- Rodwell, J. (1991) *Mires and Heaths*. Cambridge University Press, Cambridge.
- Roovers, P., Verheyen, K., Hermy, M. & Gulinck, H. (2004) Experimental trampling and vegetation recovery in some forest and heathland communities. *Applied Vegetation Science*, **7**, 111–118.
- Shaw, P.J.A., Lankey, K. & Hollingham, S.A. (1995) Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77–82.
- Stevenson, A., Rhodes, A., Kirkpatrick, A. & Macdonald, A. (1996) *The Determination of Fire Histories and an Assessment of Their Effects on Moorland Soils and Their Vegetation*. Scottish Natural Heritage, Edinburgh.
- Tantram, D., Boobyer, M. & Kirby, J. (1999) *Monitoring Heathland Fires in Dorset: Phase 2*. Report to DETR, Northampton.
- Taylor, K., Anderson, P., Taylor, R.P., Longden, K. & Fisher, P. (2005) *Dogs, Access and Nature Conservation*. English Nature, Peterborough.
- Thurston, E. & Reader, R.J. (2001) Impacts of Experimentally Applied Mountain Biking and Hiking on Vegetation and Soil of a Deciduous Forest. *Environmental Management*, **27**, 397–409.
- Underhill-Day, J.C. (2005) *A Literature Review of Urban Effects on Lowland Heaths and Their Wildlife*. English Nature, Peterborough.
- Weaver, T. & Dale, D. (1978) Trampling Effects of Hikers, Motorcycles and Horses in Meadows and Forests. *The Journal of Applied Ecology*, **15**, 451–457.
- Willson, P. (2009) *Strensall Common National Vegetation Classification Survey, September 2009*. Wold Ecology Ltd.

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

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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:

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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:

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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:	<div style="border: 1px solid black; height: 30px; width: 100%;"></div>	

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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.

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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

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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

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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

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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

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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

NB: Additional text is **bold and underlined**; Deleted text is ~~bold and struckthrough~~.

Policy EC1: Employment Allocations

Site	Floorspace	Suitable Employment uses
E18: Towthorpe Lines, Strensall (4ha)*	13,200sqm	B1c, B2 and B8 uses.
* 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 also take account of Policy GI2.		

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.

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

Document Reference: WIE13194-104-1-1



Air Quality Assessment

Air Quality Modelling Assessment

April 2018

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Client Name: York City Council
Document Reference: WIE13194-103-R-1-2-3-CB
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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
Draft	April 2018	Chris Brownlie Principal Consultant 	Kirsty Rimondi Technical Director	Guido Pellizzaro Associate Director 
Final	25 April 2018	Chris Brownlie Principal Consultant 	Kirsty Rimondi Technical Director	Guido Pellizzaro Associate Director 

Comments

Comments



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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 document¹. 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_x) 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_x 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**.

¹ 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/EC² 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 2010³ 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 1995⁴ 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 2007⁵ 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 ECE⁶ 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_x 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_x relevant to this assessment are summarised in Table 1 below.

² European Council Directive 2008/50/EC of 21 May 2008 on ambient air quality and cleaner air for Europe

³ Defra, 2010, 'The Air Quality Standards Regulations'

⁴ Office of the Deputy Prime Minister (ODPM), 1995, 'The Environment Act 1995'

⁵ Defra, 2007, 'The Air Quality Strategy for England, Scotland, Wales & Northern Ireland'

⁶ <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 _x)	30µg/m ³	Annual Mean
	75µg/ m ³	24 Hour Mean

- 2.9. Several studies^{7,8} 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_x are thought to be more significant than the short-term effects'. Therefore, this assessment only considers the annual mean NO_x concentration.

Critical Loads

- 2.10. A Critical Load is defined by the Air Pollution Information System (APIS)⁹ 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).

⁷ Sutton et al. (2013), The European Nitrogen Assessment: Sources, Effects and Policy Perspectives. Page 414. Cambridge University Press. 664pp. ISBN-10:1107006120

⁸ 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

⁹ <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 website¹⁰ to identify the baseline conditions within the relevant ecological sites and those habitats sensitive to changes in NO_x 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 document¹¹.

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 NO₂ 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 AQTAG¹² 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.

¹⁰ <http://www.apis.ac.uk/>

¹¹ 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

¹² 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 _x	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 website¹³ 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_x 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.

¹³ www.apis.ac.uk

Table 3: Habitat Description

Site	
Strensall Common	<ul style="list-style-type: none"> • 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) • Northern wet heath: <i>Erica tetralix</i> dominated wet heath • European dry heaths (H4030)
Clifton Ings	<ul style="list-style-type: none"> • Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland), (<i>Cynosurus cristatus</i> - <i>Caltha palustris</i> grassland)
Fulford Ings	<ul style="list-style-type: none"> • Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland) • Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)
Askham Bog	<ul style="list-style-type: none"> • 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) • Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow)
Church Ings	<ul style="list-style-type: none"> • Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)
Acaster South Ings	<ul style="list-style-type: none"> • Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland)
River Derwent	<ul style="list-style-type: none"> • Fen, marsh and swamp (<i>Carex echinata</i> - <i>Sphagnum recurvum</i> (<i>fallax</i> / <i>auriculatum</i> (<i>denticulatum</i>)) 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)
Lower Derwent	<ul style="list-style-type: none"> • 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)

Note: Habitat descriptions taken from APIS website

Assessment Criteria

- 3.8. The Defra and Environment Agency online guidance¹¹ 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 NOx 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 1998¹⁴. This determined that the AQS objectives for CO, Benzene (C₆H₆), 1,3 butadiene (C₄H₆), and lead (Pb) were not at risk of being exceeded. However, it also concluded that further stages of review and assessment were required for NO₂, SO₂ and PM₁₀.
- 4.2. A Second and Third Stage Review and Assessment of air quality was undertaken in February 2000¹⁵. This report concluded that the air quality objectives for SO₂ and PM₁₀ would be met. The report also predicted breaches of the annual average NO₂ 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 NO₂ AQS objective in January 2002, this AQMA was subsequently amended in 2012 to include the 1-hour mean NO₂ AQS objective as several properties within the AQMA. An AQMA was also declared in 2010 for the annual mean NO₂ objective for an area along Fulford Road, Main Street and Selby Road.
- 4.4. CYC undertook an Updating and Screening Assessment (USA) in 2015¹⁶ and an Annual Status Report in 2017¹⁷, the findings of both confirmed that 1,3 butadiene, CO, Pb, Benzene and SO₂ 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 NO₂ 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 NO₂, four monitor PM₁₀ and three monitors PM_{2.5}. NO₂ 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 _x	59	55
NO ₂	25	23

- 4.8. The monitoring results in **Table 4** indicate that the annual mean NO_x objective of 30µg/m³ (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**.

¹⁴ City of York Council (1998) First Stage Review and Assessment of Air Quality

¹⁵ City of York Council (2000) Second and Third Stage Review and Assessment

¹⁶ City of York Council, Updating and Screening Assessment for City of York Council, April 2015.

¹⁷ 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 NO₂ objective of 40µg/m³ 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_x 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_x 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	<ul style="list-style-type: none"> 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) Northern wet heath: <i>Erica tetralix</i> dominated wet heath European dry heaths (H4030) 	13.13	8.40	24.08	15.41
Clifton Ings	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland) Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow) 	19.69	12.60	21.14	13.53
Askham Bog	<ul style="list-style-type: none"> 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) Fen, marsh and swamp (<i>Juncus subnodulosus</i> - <i>Cirsium palustre</i> fen meadow) 	22.02	14.09	34.58	22.13
Church Ings	<ul style="list-style-type: none"> Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland) 	15.26	9.77	20.58	13.17
Acaster South Ings	<ul style="list-style-type: none"> Neutral grassland (<i>Alopecurus pratensis</i> - <i>Sanguisorba officinalis</i> grassland) 	14.78	9.46	18.90	12.10
River Derwent	<ul style="list-style-type: none"> Fen, marsh and swamp (<i>Carex echinata</i> - <i>Sphagnum recurvum</i> (<i>fallax</i>) / <i>auriculatum</i> (<i>denticulatum</i>) 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) Water courses of plain to montane levels with the <i>Ranuncion fluitantis</i> and <i>Callitricho-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) 	16.26	10.40	14.56	9.32

Lower Derwent	<ul style="list-style-type: none"> • 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) 				
	<ul style="list-style-type: none"> • <i>Anas penelope</i> (Western Siberia/North-western/North-eastern Europe) - Eurasian wigeon (A050) 	17.18	11.00	17.36	11.11
	<ul style="list-style-type: none"> • <i>Anas crecca</i> (North-western Europe) - Eurasian teal (A052) • <i>Anas clypeata</i> (North-western/Central Europe) - Northern shoveler (A056) • <i>Pluvialis apricaria</i> [North-western Europe - breeding] - European golden plover (A140) • <i>Philomachus pugnax</i> (Western Africa - wintering) - Ruff (A151) • <i>Cygnus columbianus bewickii</i> (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_x

- 5.1. The modelling results for the maximum predicted annual mean NO_x 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_x Concentrations

Receptor	Grid Reference of Receptor	Predicted Annual Mean NO _x Concentration (µg/m ³)		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_x concentrations are below the annual mean Critical Level of 30µg/m³ 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_x 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

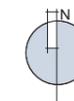
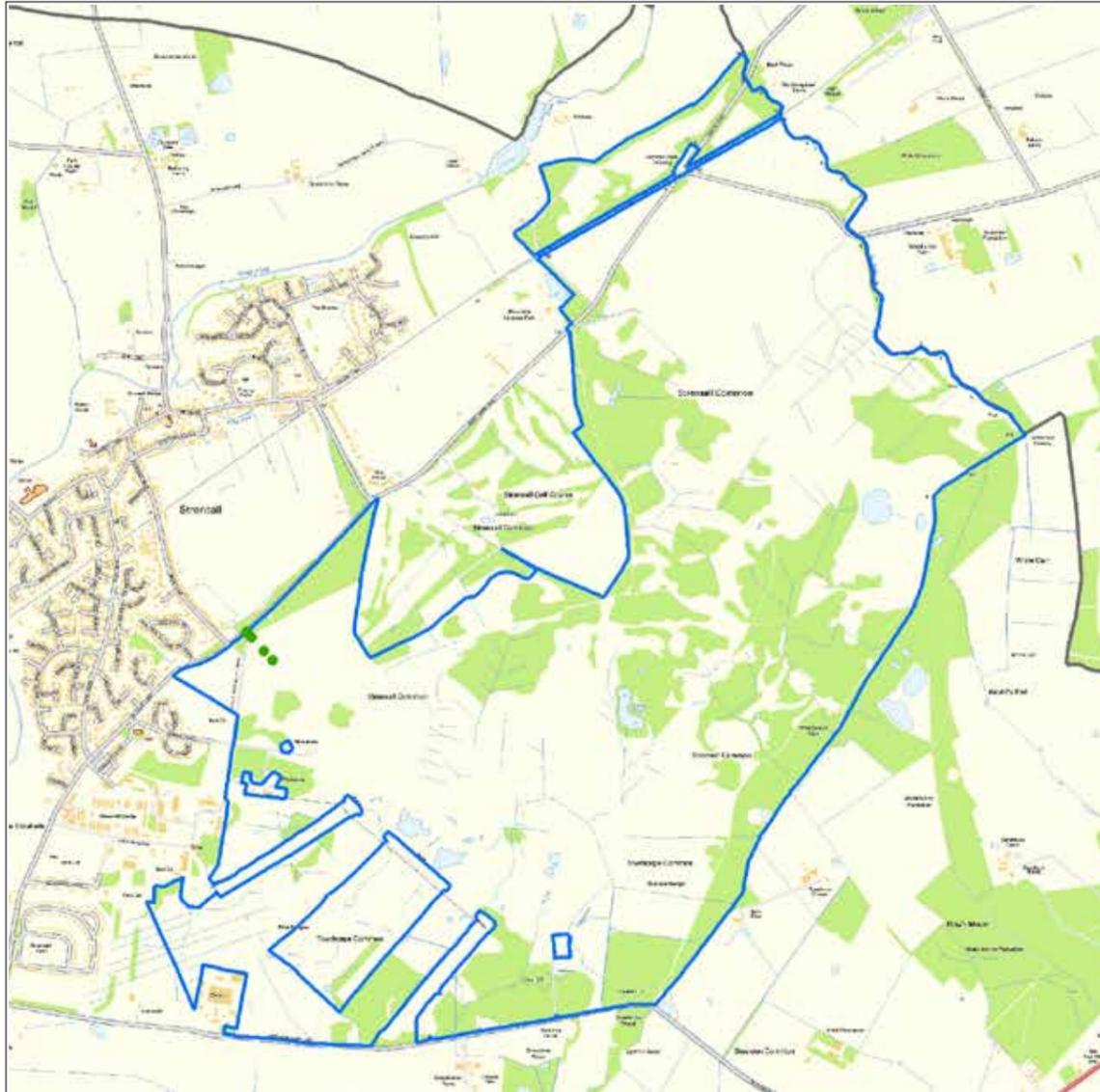
Receptor		Process Contribution (kgN/ha/yr)		Proportion of Critical Load (%)			
				PC		PEC	
		PC	PEC	Low	High	Low	High
Strensall Common	Dwarf shrub heath	0.28	15.69	2.8	1.4	157	78
	Northern wet heath						
	European dry heaths (H4030)						
	Fen, marsh and swamp	0.28	15.69	1.9	1.1	105	63
Clifton Ings	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.

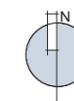
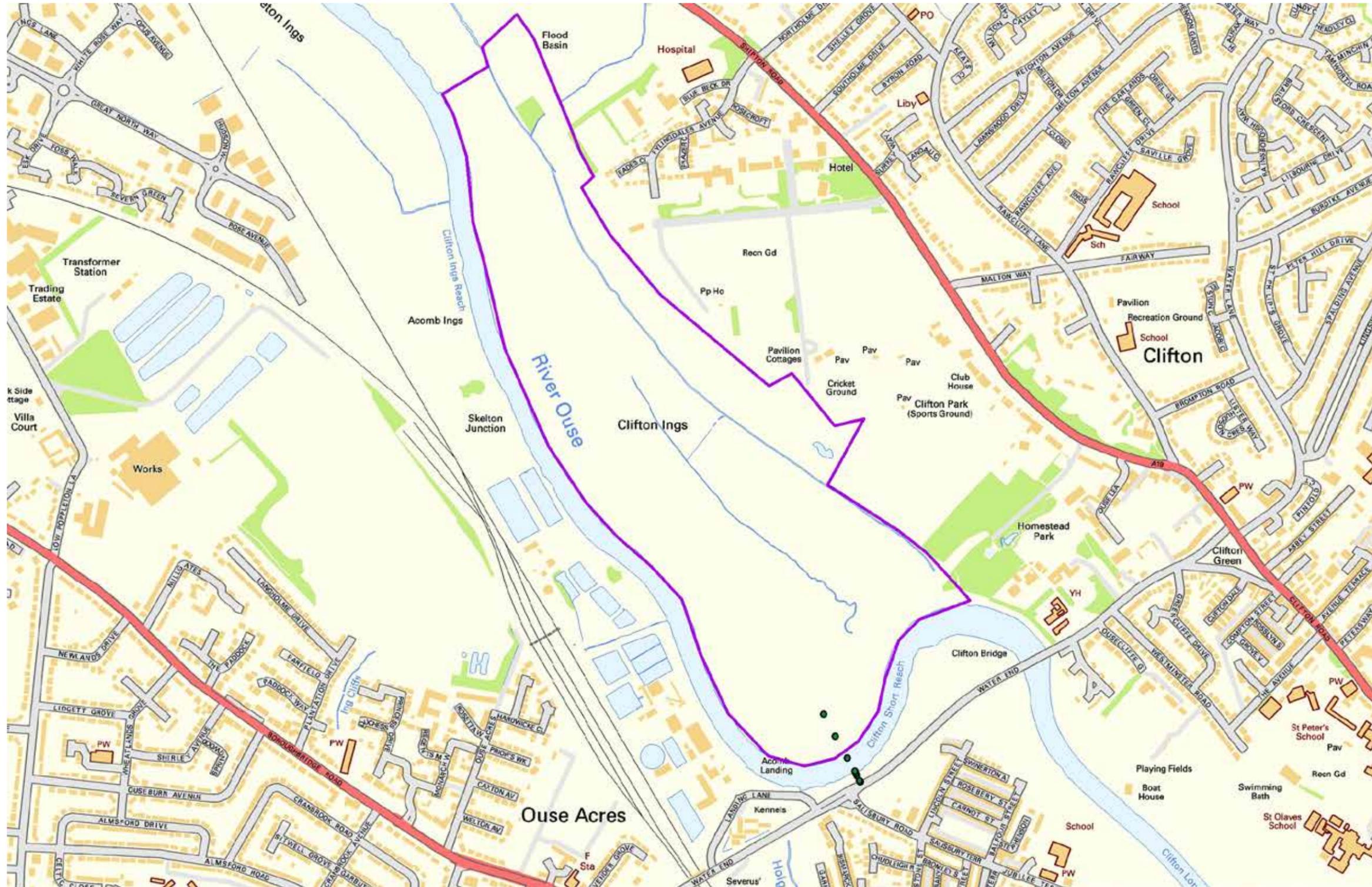
6. Summary and Conclusions

6.1. Overall the assessment has identified that following the adoption of the Local Plan:

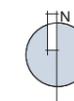
- the predicted effects on annual mean NO_x concentrations are considered insignificant at all ecological sites;
- the predicted effects on nitrogen deposition is insignificant at most ecological sites, however the impacts at the Dwarf shrub heath at the Strensall Common ecological site cannot be screened out at this stage. Therefore, further consideration to the significance of impacts at this site is considered within the HRA.



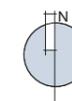
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Figure Title	Figure 1: Strensall Common Transect Location
Figure Ref	WIE13194-103_GR_AQ_1A
Date	April 2018
File Location	\\s-incs\wiel\projects\wie13194\103\graphics\laq\issued figures



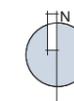
Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 2: Clifton Ings Transect Location
Figure Ref	WIE13194-103_GR_AQ_2A
Date	April 2018
File Location	\\s-inc\wiel\projects\wie13194\103\graphics\laq\issued figures



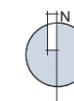
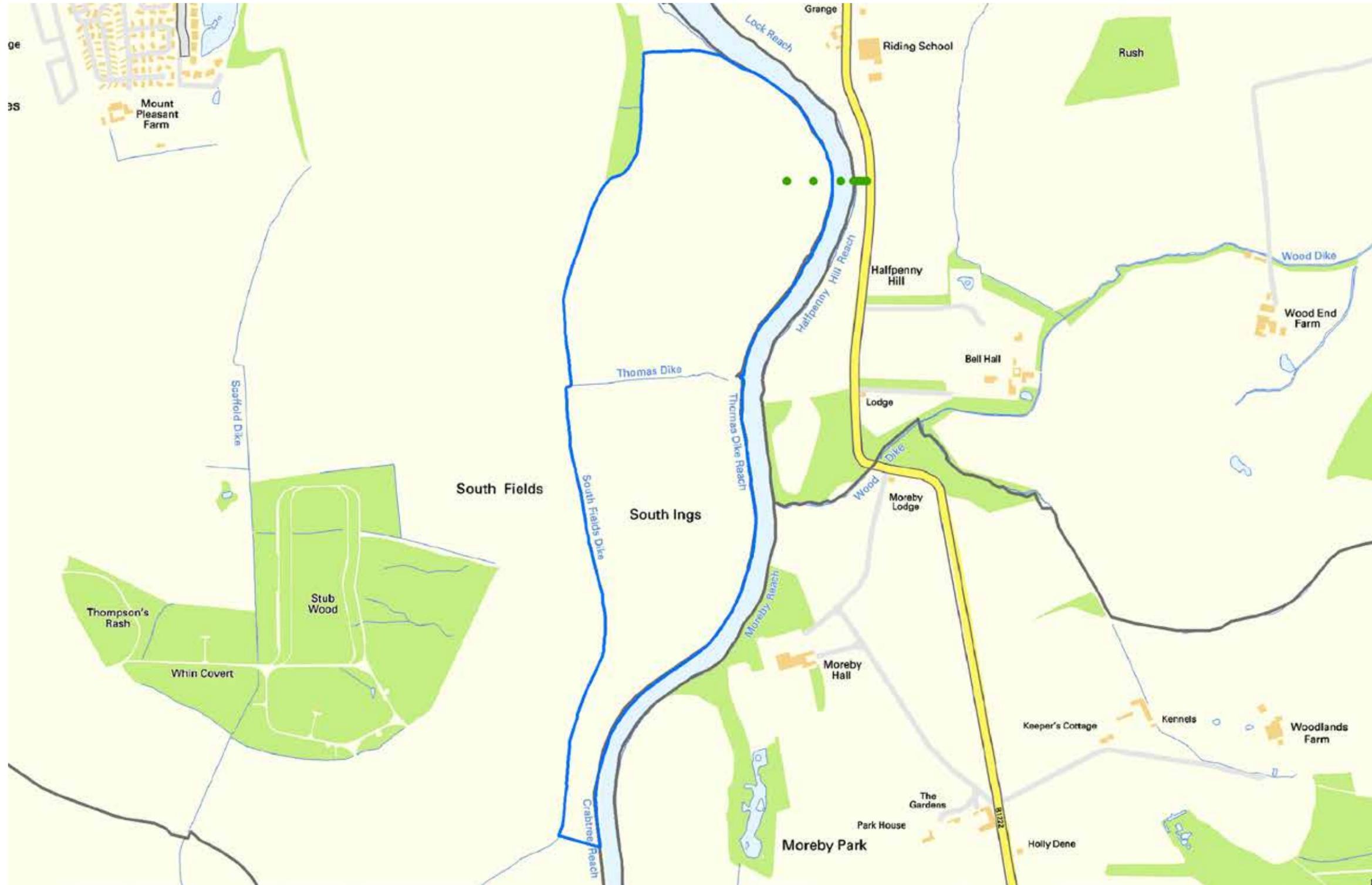
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Figure Title	Figure 3: Fulford Ings Transect Location
Figure Ref	WIE13194-103_GR_AQ_3A
Date	April 2018
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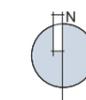
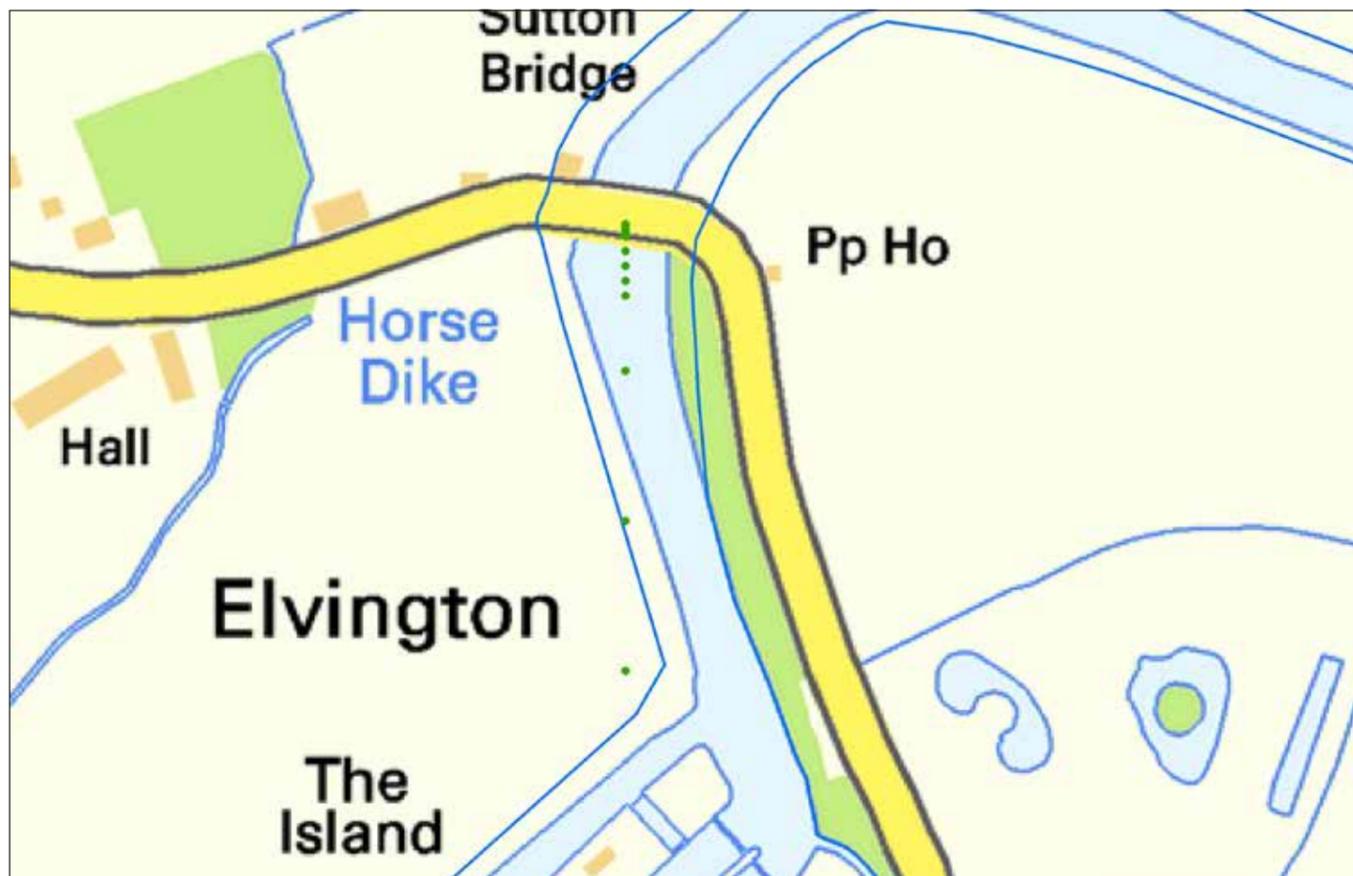
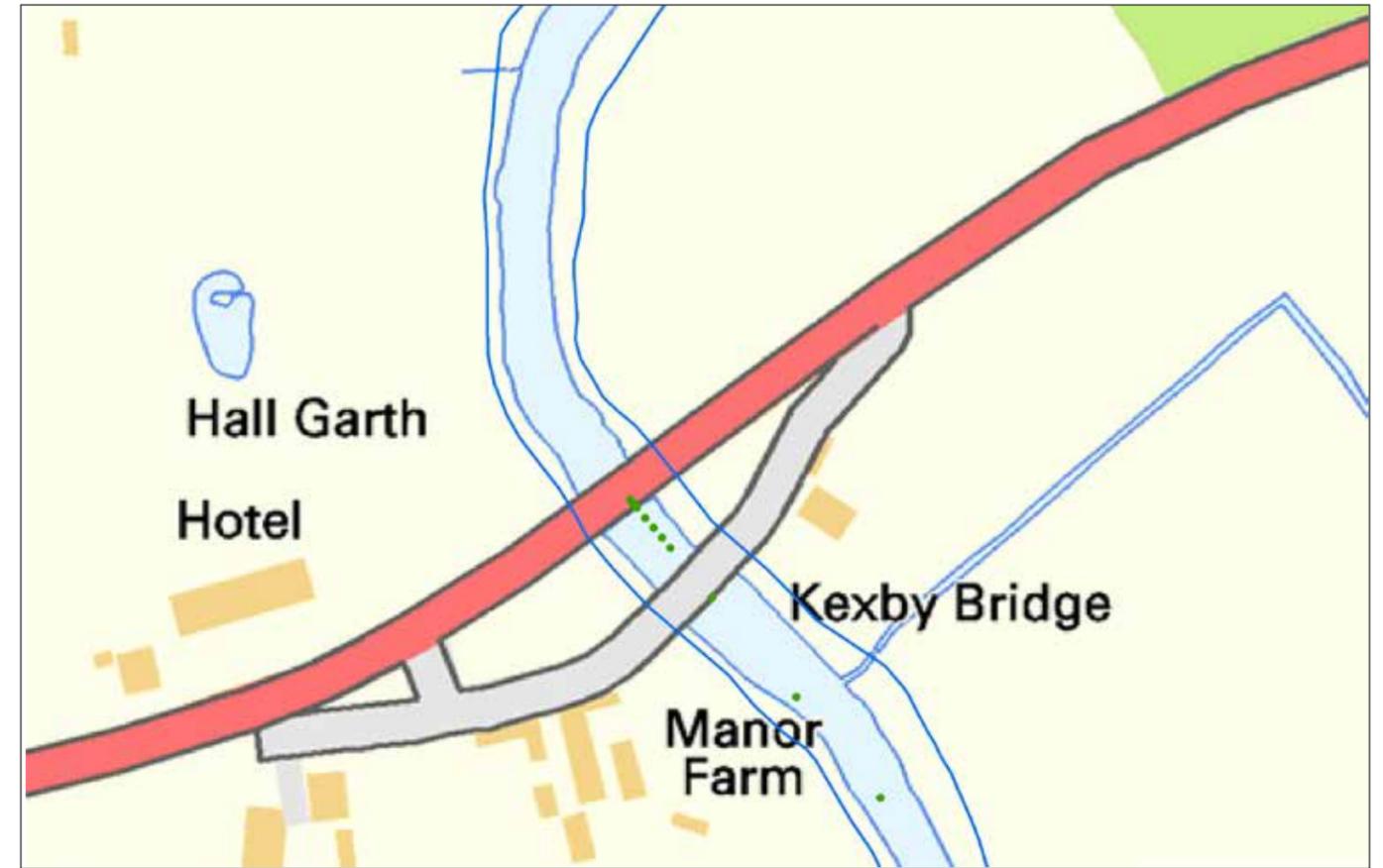
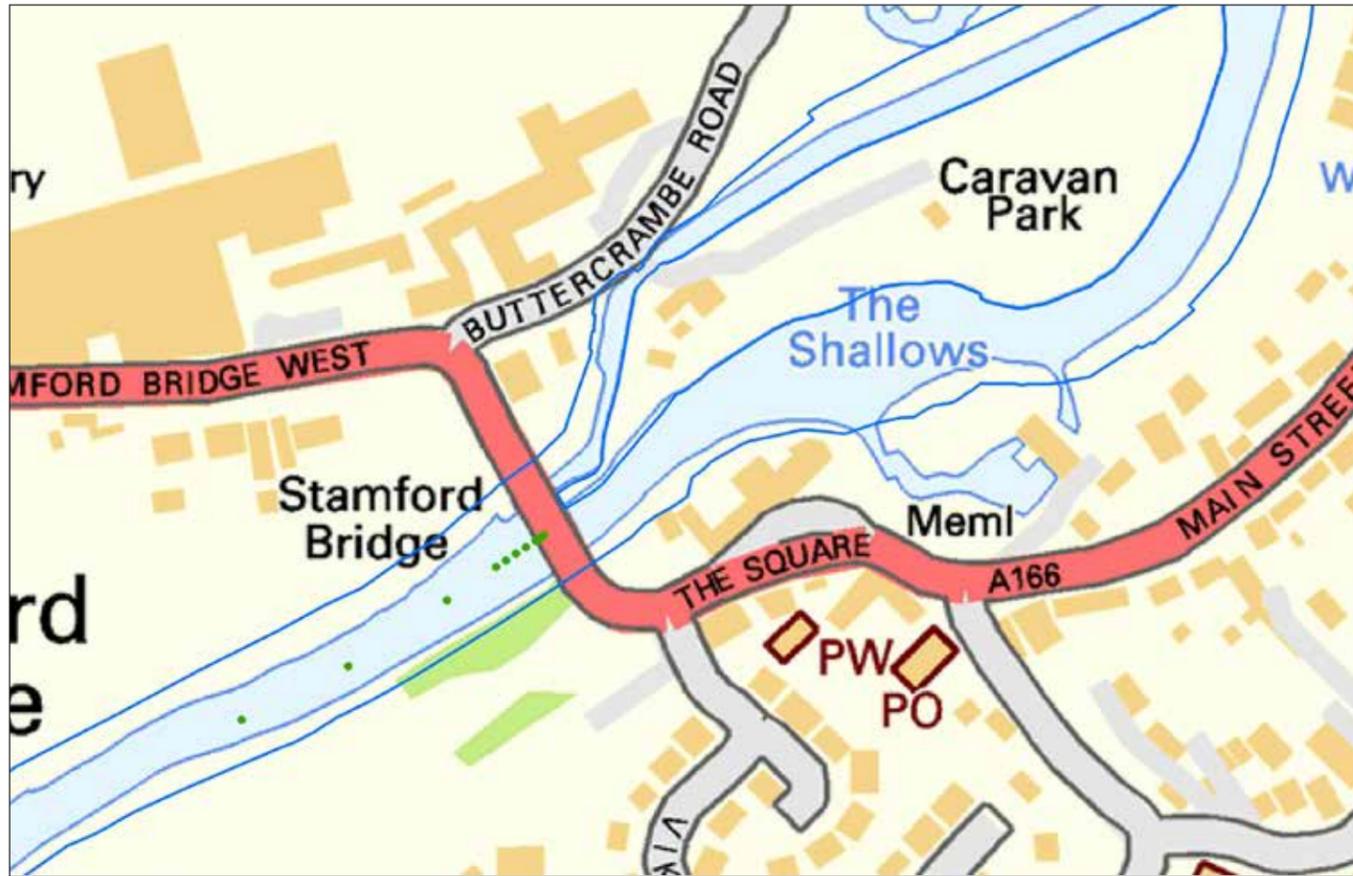
Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 4: Askham Bog Transect Location
Figure Ref	WIE13194-103_GR_AQ_4A
Date	April 2018
File Location	\\s-inc\wie\projects\wie13194\103\graphics\laq\issued figures



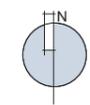
Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 5: Church Transect Location
Figure Ref	WIE13194-103_GR_AQ_5A
Date	April 2018
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Project Details	WIE13194-103: York Air Quality Assessment
Figure Title	Figure 6: Acaster South Ings Transect Location
Figure Ref	WIE13194-103_GR_AQ_6A
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
File Location	\\s-Incs\wiel\projects\wie13194\103\graphics\la\issued figures



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.

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.

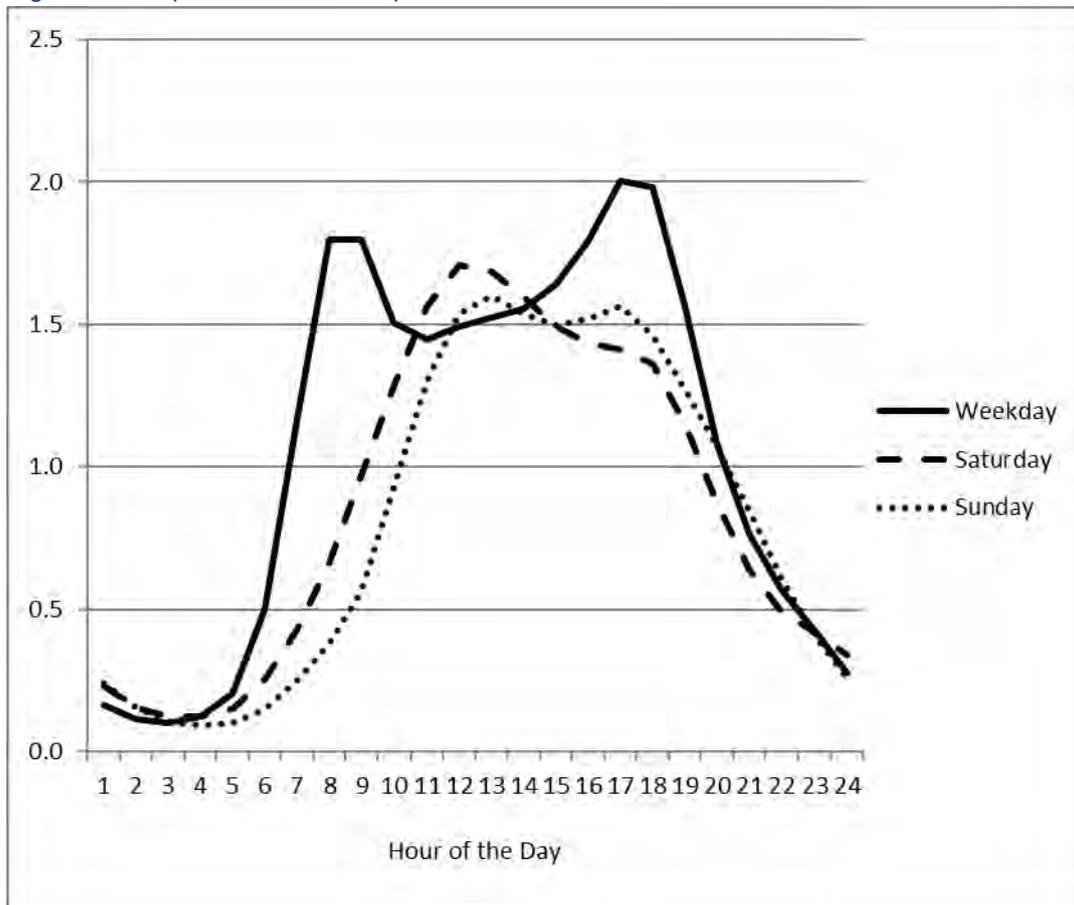
Table A1: 24-hour AADT Data Used within the Assessment

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', 2016¹, 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



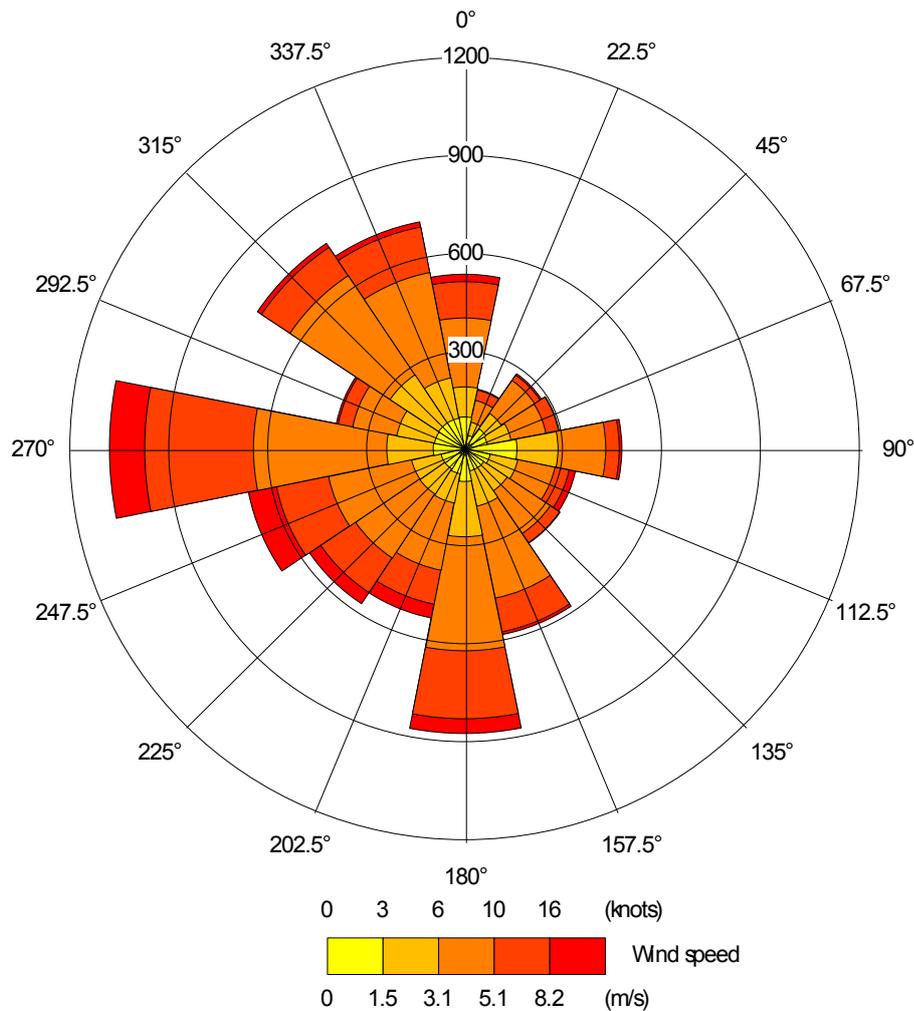
Meteorological Data

- 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

¹ Department for Transport (DfT) Statistics, 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

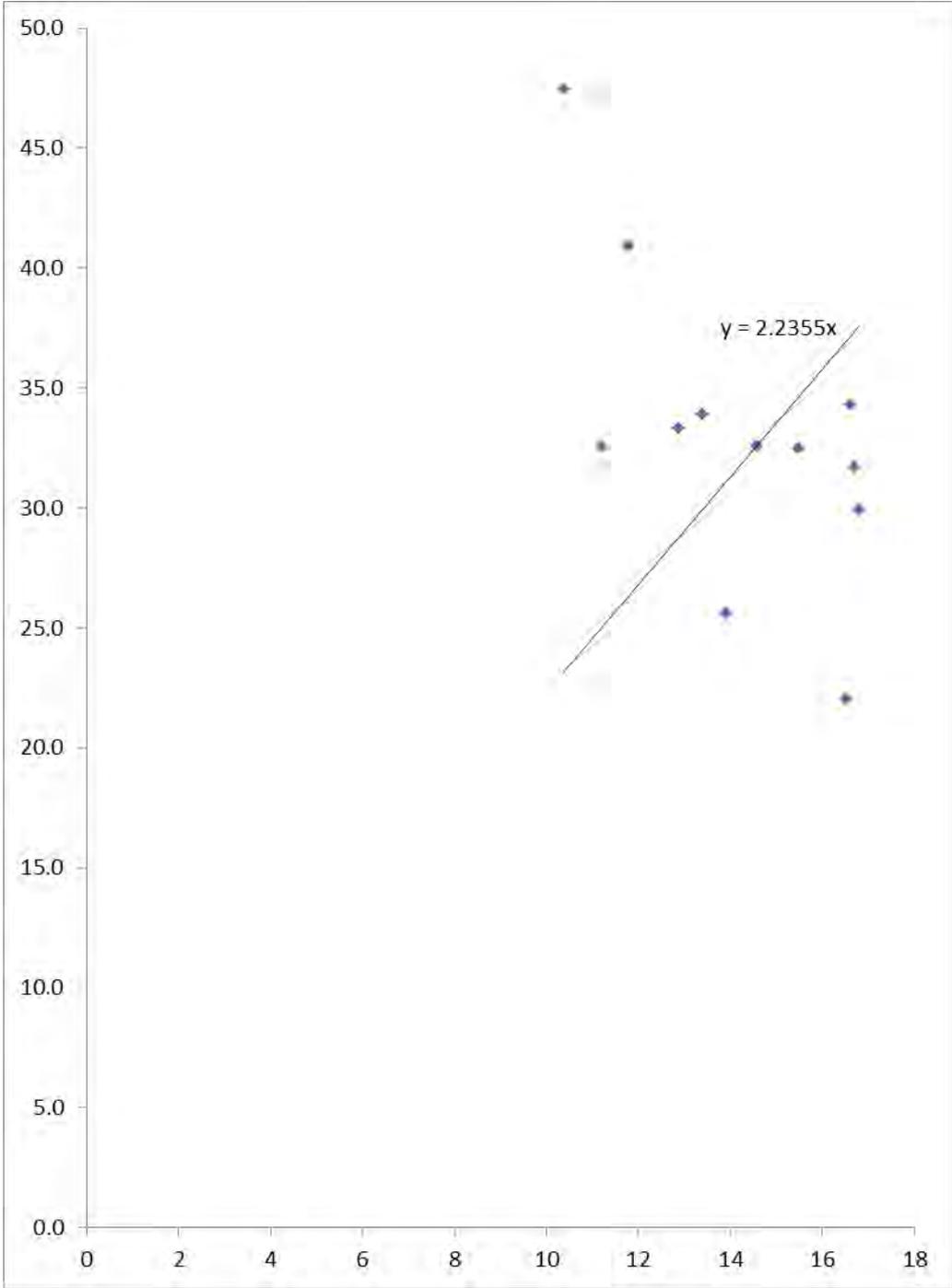
- 1.19 Model verification is the process of comparing monitored and modelled pollutant concentrations for the same year, at the same locations, and adjusting modelled concentrations if necessary to be consistent with monitoring data. This increases the robustness of modelling results.
- 1.20 Discrepancies 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_x contributions and calculating an adjustment factor. This requires the roadside NO_x contribution to be calculated. In addition, monitored NO_x concentrations are required, which were calculated from the annual mean NO₂ concentration at the diffusion tube site using the NO_x to NO₂ 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_x Emissions (µg/m³)

Site ID	Monitored NO ₂	Monitored NO _x	Monitored Road NO ₂	Monitored Road NO _x	Modelled Road NO _x	Ratio of Monitored Road Contribution NO _x /Modelled Road Contribution NO _x
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_x (i.e. total NO_x minus background NO_x) 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_x at the Monitoring Sites (µg/m³)



1.23 Consequently, in **Table A11** the adjustment factor (2.2355) has been applied to the modelled NO_x Roadside concentrations.

Table A3: Model Verification Result for Adjustment NO_x Emissions (µg/m³)

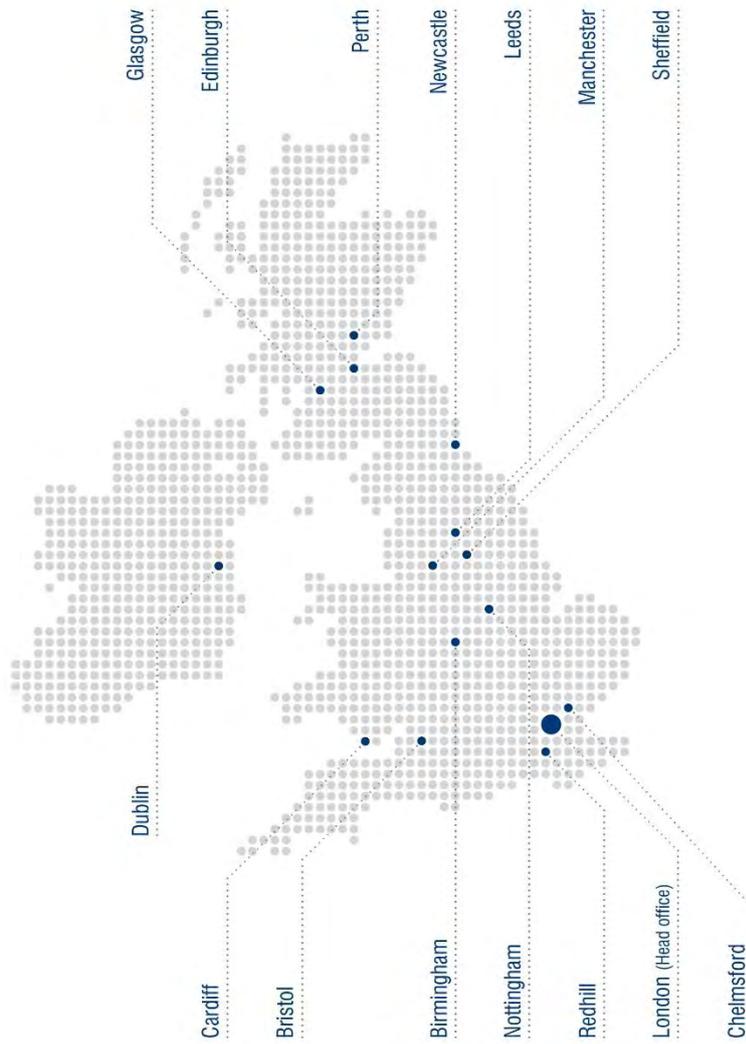
Site ID	Adjusted Modelled Road NO _x	Adjusted Modelled Total NO _x	Modelled Total NO ₂	Monitored Total NO ₂	% Difference
47	26.6	42.1	25.1	28.3	-11.2
A12	34.8	53.9	31.2	29.0	7.7
A96	32.1	53.8	31.5	31.7	-0.6
C29	30.2	48.8	28.9	30.0	-3.8
C30	37.1	55.7	32.1	30.8	4.2
C34	28.8	45.1	26.7	25.2	6.0
C36	23.2	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_x adjustment process was applied to all roadside NO_x 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



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