

## YORK LOCAL PLAN

### Supplementary Evidence relating to:

#### MIQs Matter 7 – Strategic Housing Site Land West of Elvington Lane

#### From:

Tim Tozer.

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#### Background & Context:

This evidence is supplementary to responses made by me in the 2021 Consultation and also in earlier Consultation exercises. It expands on points made elsewhere, reflects further detailed perusal of latest published documents, and attempts to pull together various threads.

It represents my own views, as a local resident. Submitted as requested before 5 July 2022, prior to the Phase 3 Hearings. Among background documents are:

*EX\_CYC\_59g\_Topic\_Paper\_1\_Green\_Belt\_Addendum\_January\_2021\_Annex\_5\_Freestanding\_Sites* [Ref 1].

#### Topic: Site ST15, and in particular its impact upon Elvington and its environmental impact

#### Overview

This massive proposed ST15 development is not totally unwelcome, and clearly has a significant potential towards helping solve the housing crisis. However, as presented it has major drawbacks and is unsatisfactory. Here I concentrate on three main issues:

- Poor impact assessment and consultation;
- Undue proximity to Elvington;
- Environmental effect of development on the airfield runway.

#### Presentation, analysis & consultation so far

The proposals for what is tantamount to a whole new town have received astonishingly little media attention or publicity. And despite the formal consultation process, there seems to have been no meaningful attempt to engage with the villagers or the Parish Council of Elvington, who will be most directly affected, and to explore the impact upon their village. Others may attest to this lack of engagement, amounting to disdain.

At a 'roadshow' about the Local Plan (in Copmanthorpe) I enquired of the CYC planning officers how they engaged with Parish Councils and took cognisance of local views. Their response was (I quote) "Oh, we don't talk to them – they're all Nimbys!". I fear that attitude is all too evident. It is doubly unfortunate when at the same time declarations are made about preserving the setting of York and the character of (the very few remaining) rural villages.

There is a good deal of documentation about ST15 within the Local Plan, but the scale and impact upon the local community is hard to grasp. It will be massive impact, and local residents have difficulty seeing the wood for the trees.

And the hyperbole is astounding. “Garden village” sounds quaint, but with a planned population almost that of Pocklington (population 9,854 in 2020), it would be either a town or a massive dormitory suburban-like area. And putting those numbers into what is a modest area surely suggests a building density unlike any village? Pocklington has a notional population density of 3,700/km<sup>2</sup>. The proposed ST15 is listed as 159 Ha, or about half that of Pocklington; taking one of the proposed figures of 8,300 residents it would suggest a population density of c. 5220/km<sup>2</sup>. Does that stack up?

Documentation talks briefly of some shops, school surgery etc. but without conviction. Surely a great deal of infrastructure, including several shops, would be core to the planning. The need for such infrastructure & facilities is mentioned in the documentation, but what are the guarantees that they will be provided? (A useful comparison might be with Haxby, which has a very slightly larger population?)

Do we really have an idea what this settlement would actually *look like*? And what guarantees that it would be to the highest standards in every way? Despite statements in the documentation, what effort has been made to convince local people that CYC will uphold this?

Meanwhile, the plans in terms of the precise location of this new town have been extremely mercurial. Having started life adjacent to the ring road, it has moved around all over the place, and nobody is sure where the latest proposed location is. Or if they think they do, they don't trust that it won't move again.

Against this uncertainty and this lack of engagement, we have the general “consultation fatigue” of over 30 years of making representations about the Local Plan (although admittedly this Whinthorpe was not properly on the cards several years ago). And latterly this has accelerated with folk unsure whether they need to respond again or not, so the number of responses latterly has been muted.

Impact upon Elvington is clearly going to be a major issue, yet does not appear to have been directly addressed as such. There are obvious direct questions, such as “can we be sure that all the added traffic won't end up using the existing B1228?” (both during construction phase, and subsequently). – But firm answers or guarantees are hard to come by, so it is hard to think about or discuss with any degree of confidence. Adding in the fatigue and uncertainty, the true impact of ST15 upon our community feels to be only superficially addressed and remains largely unknown. ST15 has become the big “elephant in the room” unfortunately.

### **Location of ST15.**

Proposed plans have been many, but now they appear to show this new town in locations cutting across the main airfield runway and virtually abutting the north-west boundary of Elvington on the airfield industrial estate and/or (in one plan we saw) the B1228 near the existing airfield entrance.

This is all far too close to Elvington to ensure that the village can retain its character and identity. It goes firmly against various policies regarding coalescence of settlements, and will inevitably mean that Elvington becomes a suburb of the new town. That cannot be right. There needs to be a clear delineation, and indeed the need for this is emphasised in several places among the documentation.

There have been strong arguments originally from Heslington village and from CYC against the original site by the A64 ring road. They appear to have grossly over-stated the visual impact there, since the settlement would surely not be visible from Heslington village itself? Since then the site seems to have shuttled further and further away from the ring road, and ended up on Elvington airfield. One would like to understand who is driving this site movement, and whether it is opportunistic landowners or the vision of CYC?

Surely it could be well accommodated a little further towards York, such that:

- i) It would be substantially separated from Elvington – and the existing airfield could itself form a distinct, wide and moderately natural boundary to the south-east of any development?
- ii) It still need not impact upon the visual setting of York or of Heslington.

### **Elvington Airfield**

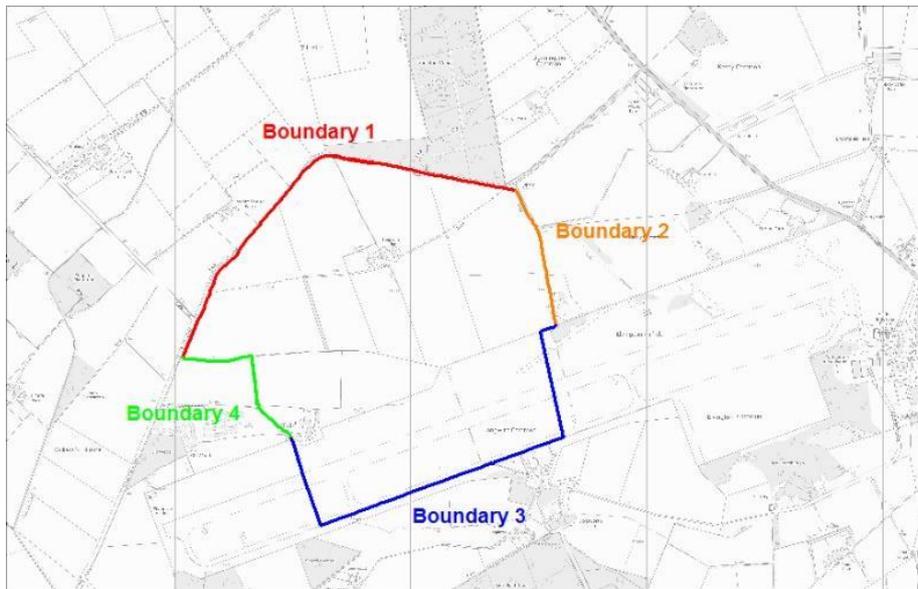
The hardened runways were built in 1943 to carry heavy bombers. It is reported that the runway is approximately 9 ft (c. 3m) thick, reinforced, (and that it also has underground fuelling pipes). Additional associated hard standing is reported as nearly 20 Ha.

Now, to quote from the Airfield FB page: *“Elvington’s 3000-metre runway is one of the longest in Britain. The airfield is used for aircraft displays, motor cycle racing, car track days, vehicle testing, sports car and police driver training, land yachting, land speed record attempts, and corporate events.”*

Elvington is proud of its airfield, and the associated Air Museum. And these events are valued far beyond our local community.

### **Arguments against airfield development and siting of ST15:**

- a) The airfield is surely a national asset. One of the longest in Britain, even if it is not required from some unforeseen aeronautical purpose, the ability to hold land speed trials etc is surely strategically valuable? ST15 as proposed will destroy this.
- b) The airfield (and its main runway) is in itself a good potential wide boundary between Elvington (with its associated industrial areas & the Air Museum) and any new settlement. It could serve a valuable purpose as such.
- c) If development astrides the airfield, and particularly the runway, then there will be absolutely no boundary to the site within the airfield or along the runway itself. See the proposal map below (which may or may not be the latest??):-



Here the description of the boundaries is disingenuous. The blue Boundary 3 does indeed have a clear lower identity, along the edge of the airfield; but its side portions have no validity at all. What is to stop it taking off along the whole length of the runway? This is indeed acknowledged on page A5:45 [of Ref 1]; but then rather dismissed or ignored. It remains a big issue.

If there is a settlement within these boundaries, what will exist outside it? Presumably nobody is going to dig up the remainder of the main runway. or the hard-standing areas. and replace them with meadows? Will residents look out from their gardens over their fences onto concrete? That residual concrete will have no value or purpose for events etc (nor anyone want them so close). Would it become some kind of dystopian urban landscape? Who will it belong to and what will go on there? Or just attract weeds?

Clearly, if it is at all economical to dig up a portion of the runway for development, then the pressure to dig up the rest and extend the new town very significantly will be overwhelming. So this present Inquiry then ought now to be considering a development some 2 or 3 times the size currently proposed, together with its environmental and other impact.

- d) Is it economical for the developers to use the runway? Will they simply build on top? What kind of “garden village” would that look like? Would folk have gardens or green space there of any sort? Presumably they’d have to dig it all up? Now bearing in mind it is reinforced concrete 3 m thick, what is the financial and environmental cost of this? Analysis has been presented in another submission pointing out that the area of concrete marked on the map above is approximately 6 Ha. If it is 3 m thick (revised estimate), and it is all removed, then that is 180,000 m<sup>3</sup> of hardcore, or roughly 13,000 lorry loads. What is the impact (and cost) of that?
- e) Then where will this hardcore go? One suspects A1 haulage (coincidentally next to the airfield) would be an obvious choice, as they are a hardcore dump already. But they are already over capacity on their main site. If they commandeer another field of say 1 Ha, then that would have spoil to a height of 18m. Is that envisaged? Is such destruction of agricultural land included in the analysis?

- f) And what will fill the hole when digging up the runway? Is that a similar problem?
- g) Looking ahead to a worst-case scenario, but perhaps inevitable, when the entire runway is dug up in the longer term, together with other hard-standing areas, think of the environmental impact (noise, dust etc.) of this operation on the (by then?) residents of Whinthorpe. Hmm..... Then the total volume of hardcore is well in excess of 1.6 million m<sup>3</sup>. Where will that go?

The above analyses may be simplistic &/or pessimistic, but have we seen answers?

### **Further impact upon Elvington**

Such proximity of an overwhelming settlement so close to Elvington contravenes many policies regarding coalescence of settlements, protecting rural nature of villages etc etc., and no doubt other representations refer to this in various ways

The most immediate and direct impact would be on the B1228 traffic. This country road is already overloaded between Elvington and York, and through Elvington itself the heavy traffic flow has long been a safety issue, with moves to ban HGvs etc. from the older part of the village regularly under discussion. The ST15 proposal talks of a new link road to the A64: that would have to happen even before main construction commenced. But what assessment has been done of residual additional traffic on the B1228 both during the construction phase and in the longer term?

It is inevitable, indeed maybe desirable, that there will be some road connection, but moving ST15 further away from the village (and the B1228) will surely help ameliorate the traffic problem.

### **Conclusions:**

This submission is in no way a comprehensive assessment of this major topic, but it presents some important issues which do not appear to have been given adequate weight.

- Consult local villages & villagers properly and seek constructive support & engagement.
- Move ST15 further away back towards the A64.
- Do not encroach on the airfield.