

Our Suggested Responses To The Draft Local Plan

* SDC = Selby District Council

Legal Compliance

Cooperation - Not Legal

SDC have failed to engage with City of York Council ("CYC") on their objections to the extra congestion on the A19 (which will be an inevitable result) caused by the Heronby site. Nor is there any evidence of consultation with neighbouring authorities on the A19 by-pass. The plan does not comply with NPPF para. 35(c).

Modification To Plan SDC should not approve any Local Plan that requires neighbouring authorities to take up the burden of delivery unless they agree to do so

Duty To Cooperate

Impending Merger Into North Yorkshire Council - No Cooperation

SDC's Local Plan may never be implemented because it includes projects that impact on other authorities with whom they are about to be merged, including conflict with new NYC objectives, and major financial obligations by NYC Highways. The plan does not comply with NPPF para. 35(c).

Modification To Plan Suspend Plan until NYC objectives are known

Infrastructure - No Cooperation

CYC have expressed concern about the impact of Heronby on the traffic flow into York along the A19 and across the A64 Fulford Interchange. The Local Plan makes no reference to this disagreement with another authority who will have to make budget allowance for A19 improvements, when have their own conflicting plans for a Garden Village elsewhere. The plan does not comply with NPPF para 35(c) as it is not based on effective joint working on strategic cross-boundary matters. Further, no assessment has been made of the effect on traffic on Cawood Road, the B1222 through Cawood (over a Grade 2 listed narrow bridge which is often closed by flooding or repairs) towards Sherburn and Leeds, or the B1222 through the villages of Stillingfleet and Naburn or traffic at the junction of Fulford Road.

Modification To Plan The approval of Heronby as the approved site should be suspended until the settlement of the disagreement with CYC on the A19 and Heronby is resolved and published

Soundness

Housing Need - Unsound

Tadcaster is described as needing new development to help regenerate the town centre and . The plan does not comply with NPPF para. 35(b). The plan does not comply with NPPF para. 35(a) as it does not seek to meet the area around Heronby's objectively assessed needs and does not meet Tadcaster's objectively assessed needs.

Modification To Plan Relocating the New Settlement allocation to Church Fenton would boost the foot-fall at Tadcaster, all accessible by cycle as well as car

Housing Need - Unsound

SG1 states "...of a scale and nature that is in keeping with the form and scale of the settlement". Surely, in the case of Heronby, it breaches that Policy by having 10x more houses than Escrick and, by being larger than Tadcaster, it will dominate the villages of Riccall, Stillingfleet and Deighton as well. The plan does not comply with NPPF para. 35(a) as it does not seek to meet the area around Heronby's objectively assessed needs. The plan is in breach of NPPF para. 79 as the new settlement will destroy the rurality of local communities. Further evidence is available if required.

Modification To Plan By bringing forward a larger number of smaller sites, the impact of any single site will be diminished and bring the developments in range of more local builders

Housing Need - Unsound

The NPPF 8(c) environmental objective is not met by Heronby: it doesn't protect our natural environment, it damages productive agricultural land, it destroys biodiversity it will cover the site in concrete, bricks and tarmac, the carbon costs of which, will take a lifetime to recover. The plan is in breach of NPPF paras. 8(c) and 35(d) as it is not sustainable development given its environmental impact. NPPF para. 119 requires that decisions should safeguard and improve the environment and make as much use as possible of brownfield land. Further evidence is available if required.

Modification To Plan SDC should endeavour to develop sites more aligned with the needs identified in the HEDNA, avoid productive land and utilise sites which make greater use of brownfield land.

Housing Need - Unsound

The SG2 suggests that 91.2Ha of employment land (which accords with the HEDNA) and at least 7728 houses will be delivered in the period 2020-40. That gives a house build-rate of 386 houses per year, which is 53 houses more than the HEDNA says is required. The extra houses, over the 18 years of the plan, amounts to 960 excess houses by 2040, which means there is no clear case for the 945 homes allocated from the New Settlement at all (Per Cllr Crane). The plan is in breach of NPPF para. 7 as it does not meet the needs of the present or the needs of the future. The plan also breaches paras. 35(a), (b) and (d) NPPF due the large oversupply of homes.

Modification To Plan No evidence has been provided to suggest that the HEDNA is wrong, SDC are planning on building far more houses than the population growth calls for,. Therefore, there is no case for any New Settlement anywhere in the District and the project should be scrapped immediately

Housing Need - Unsound

The description of Selby's brownfield sites and employment zones, Para 3.24 of the Plan describes perfectly the inappropriateness of a new settlement 10-15 miles away. A good deal of current and planned future employment land is situated south of Selby, in an arc from Eggborough to Church Fenton. Housing allocations many miles away are inappropriate, increase car journeys (and emissions) and require major infrastructure investment. The plan is in breach of NPPF para 8(a) as the proposed site does not support the economic objective as the site is in the wrong place. The plan is also in breach of NPPF para. 11 as it is not a sustainable pattern of development and the benefits do not significantly outweigh the adverse impacts. Further evidence is available if required.

Modification To Plan The rejected New Settlement sites of Burn and Church Fenton are very well placed to support the employment land allocation to the South and West of Selby where it is needed. By contrast, at Heronby, commuting to the south of the district would be slow with no direct public transport and too far for cycling.

Housing Need - Unsound

SDC does not appear to understand what Escrick Park is offering at Heronby. Under SG2, the number quoted is "a minimum of 3000 new homes", per the Foreword written by the Leader it is "up to 3400", and Escrick Park Estate, claims "a total of 4000". These are not just numbers - they are road congestion, oversized school classes, slower ambulance response, more eco-damage, and more infrastructure. But in each case they are all surplus to the needs in the HEDNA. The plan does not comply with NPPF para. 35(a) or (b) because it does not meet the area's objectively assessed needs and is not justified given the reasonable alternatives which do meet the needs of the area in a more proportionate way.

Modification To Plan If SDC are unable to get even the basic totals of their flagship plan correct, how reliable are any of the conclusions they have come to?

Housing Need - Unsound

It seems that SG4 has been waived in the case of Heronby where "the beauty of the countryside" and its "intrinsic character" are to be replaced by a new town, with houses that bear more

resemblance to an Arts & Craft style, than any local architecture. The Heronby delivery Strategy admits it "embodies the very best of North Yorkshire urbanism and architecture" with the "influence of urban green space". Further, and even if the planned architecture was deemed to be desirable, there is no requirement for house builders to develop in a particular style. Any design statement is unlikely to be adhered to by house builders on the basis of a viability argument. The scheme is on a scale that will only be deliverable by large house builders who are likely to utilise their own well-established house-types. Further evidence is available if required.

Modification To Plan SDC are obliged to build in the countryside with great sensitivity. The use of the word "Garden" does not make the Heronby plan appropriate for the landscape. Escrick Park are even trying to do this, emulating villages elsewhere in England, rather than here. This is intended as a bucolic theme park for commuters. Please stop this plan

Housing Need - Unsound

If the minimum requirement over the next 18 years is only 5155 houses, this can be achieved by building at the rate of 286 houses per year. This seems to support the HEDNA figures of just 333 pa. There is, therefore, no numerical justification here for any New Settlement anywhere in the District. Without a New Settlement, there are already identified sites amounting to 4985 houses, so 96.7% of the 18-year requirement, without taking into account of the 500 windfall development and any new sites coming forward over the next 18 years, as shown in part C of HG1. The plan is therefore in breach of NPPF para. 35(b) as the plan is not justified by the evidence available as to housing need.

Modification To Plan The entire housing build programme proposed in the Plan can be fulfilled, with ease, and without recourse to a New Settlement. The Garden Village is therefore a vanity project for Councillors and Planners.

Housing Need - Unsound

SDC believes there is a narrative of ever-growing population but, although there is a duty to look beyond the plan period, they should not do so without reasonable cause rather than dogma. They should also not commit Heronby expects to build c3050 houses between 2041 and 2065 for which there is no evidence whatever that they will be required, especially as projections are for a declining birth-rate. The plan is in breach of NPPF para. 7 as it does not meet the needs of the present or the needs of the future. The plan is therefore in breach of NPPF para. 35(b) as the plan is not justified by the evidence available as to housing need. The plan is in breach of NPPF para. 7 as it does not meet the needs of the present or the needs of the future.

Modification To Plan It is impossible to say what the HEDNA for 2040 might recommend so there is no justification whatever to allocate up to 4000 dwellings, and then build the associated infrastructure that may not be needed.

Affordable Housing - Unsound

Selby is known to be short of affordable housing but, even though the Plan, para 3.18 correctly identifies the areas of lower costs housing, the preferred option for the new Settlement is amongst the most expensive housing in the area. Also, in the resale market, house prices will quickly rise out of reach caused by the proximity of York.

Modification To Plan Permit the build of more houses in the lower priced areas of the District, nearer jobs. Don't allow housebuilding sites near York

Affordable Housing - Unsound

Since the Local Plan was drafted the economic landscape has changed entirely: Recession and redundancy, aggravated by higher mortgage rates seems likely for the next 3 years. If building homes for local people that they can afford, then this Local Plan must be reconsidered to bring forward a settlement in a less expensive area.

Modification To Plan When more statistics are available about employment and economic activity, revisit the Plan and check whether indicators have moved downwards. In the meantime, Halt Heronby.

Allocation Of Stil-D Unsound

There is a mismatch between the Stil-D site proposed to be allocated and the actual offering by Escrick Park Estates. The 173ha in the LocalPlan has been expanded by 68ha on the southern boundary, and a further 46ha country park. These extensions were not part of any public consultation or other stakeholders, are not addressed in the Local Plan and the country park has not been subject to any impact studies. Therefore, this is unsound because there has been no public consultation on these proposals and the local plan does not therefore comply with the NPPF which states that a local plan is "drawn up by the planning authority in consultation with the local community". The plan is therefore not justified per NPPF para. 35(b) as the full range of evidence that may be obtained via public consultation has not been sought. Further evidence is available if required.

Modification To Plan The local plan should be regarded as inadmissible until the entire plan has been out for consultation.

Allocation Of Stil-D - Unsound

Three potential New Settlement sites were considered, of which one is a brownfield site and the other in SDC's ownership, for the 'purpose of development'. SDC, by selecting an agricultural greenfield site, has ignored the Selby District Economic Development Framework focus and its obligations under NPPF para. 121 which require it to bring forward land which is on brownfield registers or in public ownership. NPPF para. 119 requires that decisions should safeguard and improve the environment and make as much use as possible of brownfield land.

Modification To Plan SDC should now reconsider bringing brownfield/development sites into use ahead of Heronby, and avoid the downside of traffic, ecology and infrastructure, whilst allocating homes near places of work.

Allocation Of Stil-D - Unsound

Flood risk has been used as the pre-eminent criteria for selection, leading to the selection of Heronby. However, current flood events are directly linked to the loss of countryside from earlier times and we shouldn't add to the problem by using more productive greenfield sites now. The plan is not justified per NPPF para. 35(b) as there is an alternative site for a new settlement in Church Fenton which has a low risk of flooding and is entirely brownfield. Further evidence is available if required.

Modification To Plan Make criteria that worsen future climate change as important as avoiding high risk areas.

Allocation Of Stil-D - Unsound

Burn Airfield was purchased for £1.7M by SDC in 2014 for the purpose of "potential future development for the better planning of the district". The Selby District Economic Development Framework can be achieved by Burn as the preferred site (assuming a New Settlement is required at all). Para. 121 of NPPF requires the authority to bring forward suitable sites held in public ownership. Further evidence is available if required.

Modification To Plan The rejection of Burn as a development site should be accompanied by a statement explaining why flood mitigation measures were not proposed. It should include what the new current purpose for the site is or inform if the ratepayers investment be written off?

Biodiversity Gain - Unsound

The net gain in biodiversity target is to be welcomed but, without a very comprehensive base line survey by trusted independent consultants, it is an abstract concept. For example, Heronby's pre-development habitat baseline was surveyed in a "walkover" in February 2021, which excluded the Country Park and potential by-pass land. All hibernating mammals will have been missed from this exercise, as will all summer bird migrants and many winter migrants (which are in itinerant flocks). It also failed to identify the 210 acres managed under the mid-Tier Countryside Stewardship scheme for around 20-years and that this area is farmed regeneratively, expressly to reverse climate change by rebuilding soil organic matter and restoring degraded soil biodiversity – resulting in both carbon drawdown and improving the water cycle. The Escrick Park Preliminary Ecological Appraisal is, therefore, not capable of representing a realistic assessment of the overall ecology of

the area. The plan is not consistent with NPPF paras. 35(a) and (b) as it is not sustainable and ignores a wholly brownfield option. Further evidence is available if required.

Modification To Plan No increase in biodiversity will take place at Heronby until long after construction has finished, at least 50 years into the future. By comparison, brownfields have less biodiversity to lose and thus a great deal more to gain so reallocating the New Settlement to Church Fenton improves both sites.

Biodiversity Gain - Unsound

The worthwhile aim of "giving residents access to high quality open space" requires caution: The harm done by incorporating ancient woodland and greenfield sites into the recreational/leisure plan is ignored. In Heronby, we believe that the Country Park was added without consultation, to mitigate the exact same risk of excessive recreational use at Skipwith Common. Every aspect of the Heronby site adjacent to the ancient trees of Heron Wood and close by hedges is intrinsically harmful to all the biodiversity with or without buffer zones. Destroying existing landscapes and mitigate them with a man-made one is pointless. The plan is not consistent with NPPF paras. 35(a) and (b) as it is not sustainable.

Modification To Plan Treating ancient woodland as a domestic leisure resource is disappointing - at 450 years old it is far too valuable to allow unrestricted access by dogs and cats and the potential for human vandalism. The site should be put under a management contract with The Woodland Trust to ensure its continuing health and longevity.

Unsound Methodology - Unsound

The Site Assessment Methodology that selected STIL-D has been distorted by: a) revisions to the Local Plan objectives and b) failed to set tests that reflect fairly the NPPF and then c) failed to follow its own published Stage 1 (Initial Sift) site assessment methodology, and finally d) findings were not reflected accurately in Sustainability Appraisal and Plan. The plan is therefore in breach of NPPF para. 35 (b) as it does not rely on proportionate evidence. Further evidence is available if required.

Modification To Plan To be credible, all the sites to which the SAM was applied should be assessed using identical criteria that directly match the Local Plan objectives.

Unsound Methodology - Unsound

The NPPF para. 180(c) recommends refusal for any development resulting in the "deterioration of irreplaceable habitat (such as ancient woodland....)" Surrounding Heronby Wood with houses and developing a country park adjacent to Moreby Wood is exactly the deterioration envisaged by the NPPF. The plan is therefore not justifiable under NPPF para 35(b).

Modification To Plan There is a need to ensure that Woodland protected in accordance with National guidelines and is not impacted by external factors such as construction, by isolation from other nature-rich features, and protected from the invasive use arising from leisure visitors and pets.

Unsound Methodology - Unsound

Heronby became the "Preferred Option" using the Site Allocation Methodology which scores different criteria in a varying and unsound manner, without any clear weighting of importance and with contradictory answers. The results were averaged in a Red, Amber, Green format, in which Heronby was subjectively declared the best option. The plan does not therefore comply with para. 35(b) of NPPF and it is questionable whether the flawed methodology would stand to legal scrutiny.

Modification To Plan The selection methodology applied to all the proposed New Settlement sites, should be much more transparent. The RAG scores, designed to be easy to read, actually mask the underlying quantitative scoring. All the sites were quite similar on the RAG method so more information should be declared to explain the delusion.

Climate Change - Unsound

Climate change is a major factor for the future and we agree with Para3.16. Why then does this plan enable at least 200ha of grassland and agricultural land, widely regarded as equivalent carbon-sinks to woodland to be lost under Heronby concrete. Moreover, 85ha have been

specifically cultivated with nature and soil health as a priority. Either of the other sites considered, would have far less impact. The plan is therefore not sustainable and contravenes para 35 of NPPF.

Modification To Plan Reconsider the scoring that led to Heronby as the preferred option, by weighting matters such as climate change much more highly.

Climate Change - Unsound

There is no computation of the carbon emissions associated with the upfront building of the site and its required infrastructure. Whilst the zero-carbon ambition for home heating and transport is seen as paramount in the Local Plan, and is to be welcomed, there is no reference whatever to the upfront carbon emissions and impairment arising from the construction phase and the loss of carbon-sink land, neither of which will ever be recovered. It is disappointing that SDC planners are so selective about compliance with policies, seemingly following the lead of the promoter, who also doesn't consider the carbon cost of all the work. The plan is not sustainable from an environmental perspective and therefore in breach of NPPF para. 8.

Modification To Plan If this is to be the standard of project analysis and selection, the Local Plan should drop all pretension of carbon neutral and should advise its partners that it no longer wishes to become part of "England's first carbon negative economy" and "Zero Carbon Humber".

Climate Change - Unsound

Electric vehicles (EV) are not carbon-free! Electricity prices have risen directly because of the cost of natural gas and oil, whilst EV's are environmentally expensive to produce, through mining of lithium and cadmium amongst other things (often from areas with poor human rights). Batteries make EV's heavier than other cars and particulate emissions from tyres and brakes are now considered worse than exhaust fumes.

Modification To Plan Although EVs maybe better than petrol vehicles, this plan should prioritise the reduction of journey length, matching housing, retail and employment in the same area.

Infrastructure - Unsound

The Escrick Park traffic consultant has identified a very modest increase in commuter traffic using models for which the methodology is not possible to test from the appendices. But if, at peak flow, the numbers are so low, why do the promoters believe that NY Highways should provide roundabouts, traffic lights and a By-Pass? The two ideas don't match.

Modification To Plan The extra traffic volumes admitted by Escrick Park, and the extra traffic volumes causing the construction of new, roundabouts, a by-pass and an upgraded A19/A64 junction, are completely at odds. This disparity must be addressed and resolved (including agreeing a way forward acceptable to CYC) before SDC commit themselves to a project on this scale.

Infrastructure - Unsound

It is understood that SDC planners are expecting 100% contribution from the promoters of each site for the required Highways infrastructure to be built up-front. According to Section 10 of the Local Plan "the development will also be required to deliver the following highway infrastructure improvements as set out...". For Heronby, Escrick Park is actually only offering to meet the marginal extra traffic contribution of 7%, and then only after the 925th dwelling is built. This 93% funding gap and 15-year delay amounts to £tens of millions yet the Local Plan is silent on this. The plan is in breach of NPPF Para. 34 as it appears that the site is not deliverable in its current form given the wholly inadequate offer of funding by the site promoter. The significant adverse effects of the plan do not appear to be able to be cost-effectively mitigated in breach of NPPF para 110(d).

Modification To Plan As with the differences between the expected traffic volumes we understand that there is a similar disparity about who pays... that the Escrick Park consultants are offering 7% of the infrastructure costs, on a lengthy phased basis, whereas SDC believe they will pay 100% much of it up front. This disparity must be addressed and resolved before SDC commit themselves to a project on this scale.

Infrastructure - Unsound

CYC have expressed concern about the impact of Heronby on the traffic flow into York along the A19 and across the A64 Fulford Interchange. The Local Plan makes no reference to this disagreement with another authority who will have to make budget allowance for A19 improvements, when have their own conflicting plans for a Garden Village elsewhere. The plan does not comply with NPPF para 35(c) as it is not based on effective joint working on strategic cross-boundary matters. Further, no assessment has been made of the effect on traffic on Cawood Road, the B1222 through Cawood (over a Grade 2 listed narrow bridge which is often closed by flooding or repairs) towards Sherburn and Leeds, or the B1222 through the villages of Stillingfleet and Naburn or traffic at the junction of Fulford Road.

Modification To Plan The approval of Heronby as the approved site should be suspended until the settlement of the disagreement with CYC on the A19 and Heronby is resolved and published.

Social Impact - Unsound

SDC has a moral and legal obligation to minimise the financial burden on ratepayers and yet there is no clarity on the costs to the community of any of the New Settlements. Compared to the infrastructure required elsewhere, Heronby looks to be substantially more expensive than all the other New Settlement options. The significant adverse effects of the plan do not appear to be able to be cost-effectively mitigated in breach of NPPF para 110(d). The plan is not justified per para 35(b) of NPPF for the above reasons.

Modification To Plan SDC has a duty of care to the ratepayers of the District (and to NYC), not to undertake projects that exceed our ability to fund. With major investment in road , education and medical infrastructure, together with uncertainties on who will pay, this project's viability is in doubt until these costs are known and revealed to the public.

Social Impact - Unsound

Medical and education facilities are presumed to be required on the same scale (all sites were evaluated on the same number of houses) but, with few spare places in Escrick and none in Stillingfleet, a development on this scale would stress these services for everyone, until any new infrastructure is built which is many years away. The inter-relatedness with traffic congestion also causes additional risk of ambulance delay for all. The lack of a coherent plan risks the overall outcome of the JN&WB Strategy for North Yorkshire to be a place where communities flourish. The plan does not accord with NPPF para. 8(b) as it will not support the wellbeing of local communities for many years (if at all) and will be harmful in the shorter-term.

Modification To Plan Greater attention to matching growth of communities with the parallel growth in services.

Agriculture - Unsound

Having discarded two alternative sites, SDC have concluded that the land loss at Heronby would only be of 'Moderate negative effect', despite 84% of the site being currently in production and yields around 4 tonnes/acre. Based on the 496 acres currently in cereal production, Heronby proposes to take £575000 of food supply out of the market, at a time of food shortages and rising prices. The government food strategy (June, 2022) recognises the need for domestic food security, and to strengthen food supply chains. Clearly SDC and the promoters of Heronby disagree. The plan is in breach of NPPF para. 8(a) as it does not ensure that land of the right type (agricultural production land) is available in the right places (the countryside) and goes against government strategy. Further, para 84 NPPF requires that planning policies and decisions should enable the development and diversification of agricultural and other land-based rural businesses. The proposed plan will obliterate the rural businesses currently situated on the land proposed to be used for Heronby and therefore breaches NPPF.

Modification To Plan The RAG system of evaluating suitability is not working because it does not adjust the weighting for matters such as national interest. Natural England should have been consulted but we cannot locate amongst the 7000 pages of documentation any such consultation. Planners can't collaborate to remove tenant farmers from their land and then put that land out of agricultural reach forever. The loss of farmland (Grade 1, 2 or 3) to housing would be prejudicial to Government efforts to improve food security and control prices. This land needs protection not buildings.

Agriculture - Unsound

There are known instances, on the land proposed to be allocated for Heronby, of farms being involved in the long term biodiversity of their operations in accordance with the various Countryside Stewardship schemes. Nowhere, in the specialist Ecological Appraisal is this mentioned. Moreover at least one farm has 85 hectares of regenerative farmland that in recent years has been raising soil biodiversity, capturing carbon and managing water supplies. This too, has not been incorporated into the Ecological Appraisal.

Modification To Plan The task of the Ecology advisors to Escrick Park Estates is to identify and recommend the state of the ecology of the site and plan to improve its biodiversity. Instead their report overlooks all the results achieved so far and acquiesces to the damage to this valuable land, suggesting the report is worthless and should be set aside.

Traffic - Unsound

Despite their ambitious plans, SDC own consultants, WSP, believe that encouraging home working will be impossible to deliver; applying only to the small amount of office-based jobs rather than the service, and industrial jobs in this area. The location of the New Settlements are therefore key to lowering journeys where locations nearer jobs encourage active travel. Equally, with cars as the default travel choice for longer journeys, more isolated New Settlements may actually increase leisure, shopping and social car trips.

Modification To Plan It is important that new development is close to existing services AND employment opportunities. Heronby is an example where neither is true, and road improvements are required as new residents seek these out.

Traffic - Unsound

Using electric vehicles may result in lower exhaust pollution, but EV's produce much more atmospheric pollution from brakes and tyres by virtue of the greater weight. Projects relying on EV's risk contravening the NY objective for Healthier Travel

Modification To Plan Ensure that vehicular journeys are shortened by reducing commute distances and encourage increased use of public transport. Site new housing as near to jobs as possible

Traffic - Unsound

Active travel options, represented by walking and cycling, are clearly good. But SDC and Escrick Park seem to believe that they can dictate to residents to use these choices, without regard to age or fitness, for leisure or work or even sport. Cycleways need to be safe, properly segregating the interests of pedestrians and cyclists; wide well-maintained and well-lit paths. Active travel won't survive stalkers and assaults, or wet and icy conditions. Naburn is closer to York, yet cycle commuters are usually very fit enthusiasts and even a proportion of these switch to driving during the daylight-saving months.

Modification To Plan We understand that everyone should exercise more, but a local Plan cannot be approved on the basis of unsubstantiated assumptions about all year round changes in personal travel decisions. There should be a planning assumption that, at best, the take-up of active travel will be slow and confined to certain groups, mainly in Spring and Summer.

Traffic - Unsound

Church Fenton is served by two train stations (running regularly between Selby, York and Leeds) which are a short walk/cycle from the possible new site, and buses to Tadcaster, Wetherby and Sherburn. Burn is well served by buses to the Selby and Pontefract. By comparison, Heronby has few buses and no trains whatsoever, and connections are highly likely to be by car. The proposed plan breaches NPPF para.8 as it is not environmentally sustainable.

Modification To Plan Enthusiasm for active travel is fine but has to be supported by good public transport and connectivity. Heronby has neither, and cars will be obligatory for all but the super-fit. Heronby may have scored well in the SAM selection, but fails at a practical level and should be scrapped.

Ecology - Unsound

The acceptance by SDC, of the consultant's (and lobbyist's) reports at Heronby produced on behalf of Escrick Park, results in no critical analysis of their conclusions that, in effect, there is NO NATURE on this 595-acre site, on the strength of a simple walkover in February 2021 (and even the ancient woodland is safe to incorporate into recreational 'green space'). With only minimal resources we have identified that there are areas of the site managed under the Countryside Stewardship Scheme as well as 210-acres (one-third of Heronby which the consultants seem to have missed) of regenerative farming aimed at naturally improving soil fertility and carbon capture - none of which has been reported upon. There was a detailed critique of earlier versions, by many respondents in 2021, which has been ignored as an "inconvenient truth". As a result, impairment of the site caused by construction vibration, noise, plastic waste, airborne chemicals, light pollution, and water pollution which are all detrimental to the ecology and woodlands of the area, is ignored.

Modification To Plan There is no need for anyone to 'look after' an ancient wood (it has managed on its own for 450 years), but there is a need to ensure it is not impacted by external factors such as construction, by isolation from other nature-rich features, and protected from the invasive use arising from leisure visitors and their pets. Furthermore the one-third of the site is already in the hands of farmers working hard to make the soils more fertile and they need no assistance from consultants.

Ecology - Unsound

Natural England's concerns of the health of the woodlands on and adjacent to the site, have been translated into a plan to meddle with its ancient nature by felling and by new tree planting. Similarly, it is believed that concerns were raised about the proximity to Skipwith Common SSSI, so the Country Park was added. SDC have then scored this mediation as a positive asset. None of Natural England's feedback has been included in the information pack which is significant lack of transparency. The proposed allocation of land for Heronby breaches NPPF para. 174(b) by ignoring the intrinsic character and beauty of the countryside and para. 8 NPPF as it is not environmentally sustainable.

Modification To Plan The treatment of all ancient woodlands, hedges and other natural features needs to be re-thought. They are not playgrounds for people to enjoy, they are the life-giving chance for the children of those people. So access needs to be carefully managed and ensure they are responsibly used - by both developers and visitors. In the case of Heronby, efforts to join the wood too the hedgerows would be an excellent improvement.