

**OPENING SUBMISSIONS**  
**on behalf of Yorkshire Wildlife Trust**

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**I INTRODUCTION**

1. *So much of the natural world is in peril and now, more than ever before, ancient places like Askham Bog, rich in biodiversity, must be protected.* I open these submissions, on behalf of the Yorkshire Wildlife Trust, with the words of Sir David Attenborough.
2. Over the next three weeks this appeal will hear evidence about flow rate calculations, water attenuation, eutrophication, habitat fragmentation, and a review of the effects of transport, heritage, planning, and population density. Certainly those without a background in science will agree that the evidence on hydrogeology alone is not for the faint-hearted.
3. And in the midst of such technical arguments, scientific investigation, and the various tests, experiments and surveys that modern technology enable, one might be forgiven for forgetting that Askham Bog is an ancient place.
4. Indeed, it is not possible to talk about Askham Bog without talking about history. History that began over 15,000 years ago when a retreating glacier left behind an ancient lake, leading to the development of the Bog. Much of this bog disappeared, most likely because it was cut and burnt as fuel, possibly from as early as Roman times, continuing up until the 18<sup>th</sup> century.
5. In the 19<sup>th</sup> century, the site is considered to have been one of the premier natural history locations in the country, notable for plants and insects, with detailed records

spanning 150 years. It was recognised as such by Charles Rothschild in 1912 as one of the best sites for nature in the UK.

6. The site was later bought by Francis Terry and Arnold Rowntree and given to what became the Yorkshire Wildlife Trust, created in 1946 to receive Askham Bog as its first reserve. The Trust has since that time and until the present day owned and managed the Askham Bog, which was first notified as a site of Special Scientific Interest nearly 60 years ago in 1961.
7. Over the course of this hearing you will hear about how the Bog occupies an important place in the heritage of York. This is due to the long period of human interaction with the Bog; its rich biodiversity and the unusually good and long-standing documentation of this; and its place in the history of nature conservation in Yorkshire.
8. But to focus on the Bog's impressive history alone, would be to ignore the particular affection in which this area is held by the living breathing citizens of York and the ways in which it is enjoyed by over 20,000 visitors a year.
9. Proof of this strength of feeling was felt in the strong public response to the this proposed development. Yorkshire Wildlife Trust's petition campaign attracted over 7,000 signatures. In less than a month 332 people raised over £28,500. 400 people wrote letters, each of which have been provided to the Inspector. I quote from a small sample;
  - *I am a local and come to the reserve frequently to enjoy the natural beauty and tranquillity. In this modern world I think it is important for people to have green places and peaceful places to go. I certainly find it helps my well-being and brings me great joy. I believe its important to protect York's 'green lungs' for everyone, locals and visitors alike. Its important to protect our environment for future generations – once its gone it will be lost forever.*
  - *Askham Bog is a wonderful place for children and families to come and develop a love for nature. It would be such a crime if future generations were denied access to the wonderful variety of wildlife here through this proposed development.*

- *As a child I played in the area and now as an adult, father and active volunteer, I visit regularly with my children.*
- *Askham Bog is a lifeline for me and my husband. We are elderly and this is one of the very few places we can visit. We love the dragonflies, butterflies and wild flowers. We see ponies and deer and love the tranquillity.*
- *In our family alone, four generations have learned to love nature at Askham Bog, which they have continued throughout their lives.*
- *It's a great place for disabled people to explore.*

10. Hearing and reading such comments, it is plain that when we talk of Asham bog, we are talking of an ancient place. But we are also talking of a living breathing resource, beloved and vital to those who enjoy it.

## II YORKSHIRE WILDLIFE TRUST

11. And so I stand here, presenting these opening submissions on behalf of the the Yorkshire Wildlife Trust in this appeal. And what do we bring to the table, one might ask?

12. Yorkshire Wildlife Trust is a charity, that works across the Yorkshire and Humber region managing more than 100 natural reserves. Its work is focused on the delivery of nature conservation benefits through nature reserves, advice, community and education. It is the second oldest of the 47 Wildlife trusts which work in partnership to cover the whole of the UK and has a membership of over 44,000 people. One full-time and one part-time staff member, neither with a legal background, are tasked with responding to 300-400 planning applications a year. Their herculean efforts have made the Trust's involvement in this hearing possible.

13. Having managed Askham Bog since 1946, it is uniquely placed to assist the Inspector in this appeal on matters of visitor experience, and with the assistance of its experts, ecology and hydrogeology.

### III EXPERT EVIDENCE

14. Over the course of the next three weeks you will hear explanation of the Trust's primary concerns about the proposed development:
  - a. how isolation of the reserve will effect biodiversity;
  - b. the risks posed by further proximity to housing; and
  - c. the proposal's impact on hydrology.
  
15. First: Biodiversity. You will hear about how Askham Bog is, for its size, the most species rich of all Yorkshire nature reserves, and has attracted naturalists from all over the UK for nearly 200 years. Recent records show that there are at least 2925 non-microbial species recorded from Askham Bog, a figure that represents over 5% of the total UK species list. Extensive lists of animal and plant species recorded on the site are unique in Yorkshire as well as nationally and internationally.
  
16. You will hear about how the Bog is already isolated, surrounded as it is by the A64 road to the south; the East Coast main line to the east; and Pike Hills Golf Sourse, which wraps round it to the south, west and north. You will hear how the isolation of the reserve from the surrounding countryside which have the effect of cutting the reserve off from nearby open areas and semi natural habitats.
  
17. Second: the consequential risks to biodiversity and the damage and disturbance due to the proximity of housing. You will also hear about how the Appellant's proposals to mitigate the effects of this housing are unworkable.
  
18. Finally: the impact on hydrology. Alex Jones, an experienced hydrogeologist, will explain how Askham Bog depends for its long-term survival on the maintenance of a high water table, especially in spring and early summer. Although managment by the Yorkshire Wildlife Trust, has resulted in a notable recovery of some of the more threatened habitat types, he will explain how any activity resulting in a reduction in the water table would inevitably lead to severe damage to the site and lead to further losses of species.

#### **IV CONCLUSION**

19. Notwithstanding the various ways in which all of our vocabularies will inevitably be enriched over the course of the next three weeks, there is one word that we ask the Inspector to consider especially in approaching this inquiry: irreplaceable. What it means for somewhere, and something to be irreplaceable. And how much, in the times we live in, we value irreplaceable things.

**Emma-Louise Fenelon**

**On behalf of Yorkshire Wildlife Trust**

**12 November 2019**