

York Environment Forum (YEF) Response to the Inspector’s Revised Phase 2 MiQs

Matter 4 – Spatial Strategy – Site Selection Process

Inspector’s Question	Our response	References
<p>Spatial strategy</p> <p>4.1 Is the Spatial Strategy set out in the Plan based on an appropriate and reasonable assessment and justified by robust evidence?</p>	<p>The spatial strategy is set out in Policy SS1. The five principles set out are broadly acceptable, albeit that bullet point 2 needs to be substantially strengthened to be consistent with the changes we have argued for under Matter 1. A further bullet needs adding regarding the need for sites to be of sufficient size and density for their specific locations to deliver the range of facilities and services required for a sustainable community (see also our response to 4.3).</p> <p>However, its claim that ‘the identification of development sites is underpinned by the principle of deliverability and viability’ can be contested. In particular, as we argued in our submission SID 332, and in matter 1, the proposed new satellite settlements at Land West of Wigginton Road (ST14) and Land West of Elvington (ST15) are too small to be deliverable or affordable bearing in mind the scale and cost of additional infrastructure in terms of public transport, schools and other essential facilities and services including shopping, and proximity to health services.</p> <p>More particularly, the transport evidence is non-compliant as it has not examined alternative spatial solution options nor identified mitigations for the consequences of the chosen pattern as required. Nor has it examined the carbon emission consequences of its proposed form against alternatives.</p>	
<p>4.2 Is the approach taken in informing the Spatial Strategy and the distribution of development</p>	<p>No – for the reasons we have already referred to in matter 1 and the preceding question 4.1.</p>	

<p>across the Plan area justified, effective and in accordance with national policy?</p>		
<p>4.3 Does Policy SS1 provide an appropriate basis for the delivery of sustainable development and growth within the City of York?</p>	<p>No. The spatial principles in Policy SS1 are incomplete. Policy SS1 does not clearly encapsulate the need to develop York in line with nationally recognised sustainability principles. At no point does it refer to:</p> <ol style="list-style-type: none"> 1. The need for new free-standing developments to be constructed as sustainable communities – of sufficient scale to support a range of local services and facilities, as well as viable, high-quality public transport. This should involve a consideration of density and the appropriate mix of land uses, as well as a mix of tenures to create diverse and socially sustainable communities. 2. The need for new developments that are integrated into the existing urban fabric in such a way as to maximise the viability of local facilities and services, as well as exploiting any spare capacity in those facilities and related public transport infrastructure. <p>There have been several well-regarded national and local research projects in recent years that have examined the scale and pattern of development most likely to produce successful sustainable communities, served by sustainable transport (see our response to question 1.1 and references there). The authors of the Draft Local Plan appear to have ignored these when drawing up their proposals. Given their importance, we recommend that these two principles are added to Policy SS1.</p> <p>The list of growth factors also omits to mention the climate change and bio-diversity crises (there is one narrow reference to bio-diversity but it ignores the crisis aspect). The massive and rapid changes that need to be made to</p>	

	address these challenges should be explicitly covered as drivers here (see also our response on Matter 8).	
<p>4.4 Policy SS1 sets out a spatial principle for sustainable modes of transport and Paragraph 3.12 of the submitted Plan says support will be provided for a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth of traffic.</p> <p>a) How does the Plan deliver this?</p> <p>b) What evidence is there that the Spatial Strategy delivers what Paragraph 3.12 of the submitted Plan says?</p> <p>c) Is it the most appropriate strategy when assessed against alternatives?</p>	<p>Policy SS1 includes two principles related to transport:</p> <ul style="list-style-type: none"> · ‘ensuring accessibility to sustainable modes of transport and a range of services · preventing unacceptable levels of congestion, pollution and/or air quality.’ <p>Para 3.12 states that it is “important that future development does not lead to an unconstrained increase in traffic ... [which] could lead to increased congestion ...” and that ‘the Local Plan will support a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth in traffic’.</p> <p>We fully support these principles, but are not satisfied that they have been effectively applied in the draft Local Plan.</p> <p>The only source of evidence for Question 4.4 is the Transport Policy Paper. As we indicated in our submission on Matter 1 question 1.1, this document is incomplete. It fails to address the requirements specified by the Department for Transport in its 2015 guidance on assessing the transport implications of Local Plans as formulated under NPPF 2012.</p> <p>As far as we can judge, the Transport Topic Paper only assesses one pattern of distribution of new development. In that assessment it predicts a 55% increase in congestion, which in our experience would be considered unacceptable, thus failing the draft Plan’s second principle above.</p> <p>The Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) that any such assessment should: <i>· assess the existing situation and likely generation of trips over time by all</i></p>	

	<p><i>modes and the impact on the locality in economic, social and environmental terms</i></p> <ul style="list-style-type: none"> <i>· assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport</i> <i>· highlight and promote opportunities to reduce the need for travel where appropriate</i> <i>· identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.</i> <p>The clear implication is that, where a particular pattern of development fails to satisfy the principles, alternative land use options should be considered, and that alternative transport strategies should also be assessed. The Council has failed to do this, and it is thus unclear whether the proposed Spatial Strategy could satisfy the Plan's principles if associated with an alternative transport strategy, or whether an alternative combination of Spatial Strategy and transport strategy would be more effective and thus more appropriate.</p> <p>Thus, in answer to the Inspectors' three sub-questions:</p> <ul style="list-style-type: none"> · the Plan does not appear to deliver the principles cited above · the Transport Topic Paper currently indicates that the Spatial Strategy fails to deliver the expectations of Para 3.12 · no alternatives have been identified or assessed. <p>As we said in our submission on Matter 1 Question 1.1, we would therefore ask that the Inspectors accept that, in this regard, the draft Local Plan is as</p>	
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	yet not justified, and ask the Council to carry out the necessary further analysis and consequential amendment, etc., before we proceed further.	
4.5 Is the proposed approach to new development and its location, as outlined by Policy SS1, sufficiently clear within the submitted Plan and is it supported by a robust and up to date evidence base?	<p>There is no reasoned justification for the approach to new development and its location. There is no evidence of a sieving exercise being undertaken following the principles of SS1 from which the locations and sizes rationally arise (other than the flood risk analysis). In terms of transport, the Plan does not show the current distribution of traffic, those corridors which are already congested and those with some spare capacity. Nor does it show those corridors where opportunities exist to increase sustainable transport.</p> <p>We strongly urge the Inspectors to conclude that the justification for the proposed approach to new development and its location needs clarification, supported by a far more robust and up-to-date evidence base. City of York Council should be directed to make good this shortcoming of the Draft Local Plan.</p>	
4.6 Are the (broad) locations for new development the most appropriate locations when considered against all reasonable alternatives?	No, for the reasons outlined in our submissions, and in responses here (to Question 1.1 in particular).	
4.7 What factors have influenced the distribution of development proposed?	It is unclear what factors have influenced the distribution, but certainly not transport & genuine sustainability or carbon emission considerations (ref. our comments on Matters 1 & 8).	
4.8 Are the factors which shape growth, as set out in Section 3 of the Plan, clearly explained, justified and set out and are they	Regarding Para 3.12, whilst we agree with the content of the first sentence, we consider the final sentence is untrue as we have argued in our submission, and it certainly has not been justified, or supported by robust evidence, as we have argued in our submission SID 374 and in matter 1, question 1.1 above and elsewhere in this submission.	

supported by robust and up to date evidence?		
<p>4.9 With regard to the impact of distribution of development on the transport network:</p> <p>a) What role has the transport appraisal had in influencing the distribution of development?</p> <p>b) Is the Council's transport evidence robust and adequately up to date?</p> <p>c) What are the cumulative impacts on the transport network of the spatial distribution of development set out in the Plan and are any adverse impacts severe? If so, how has that been addressed?</p>	<p>In response to Question 4.9a, as far as we can judge, the Transport Topic Paper was completed only after the preferred pattern of development had been identified. Certainly no attempt has been made to assess alternative patterns of development which might have mitigated the serious increase in congestion predicted. This relates to our answer to Question 4.4. As we note there, a further transport appraisal is needed in which a range of development options and a series of ameliorative transport strategies are assessed and compared with one another. We are asking the inspectors to request the Council belatedly now do that.</p> <p>In response to Question 4.9b, the 2019 update of the Transport Topic Paper describes the modelling approach adopted. The Council's strategic model uses SATURN, which is a highway network model of traffic flows and speeds, and CUBE, which provides a relatively simplistic representation of other modes and of demand response. It was calibrated to 2016 conditions, which would have been a reasonable approach at the time. However, it is important to note that such an approach:</p> <ul style="list-style-type: none"> · has only a limited representation of public transport services · only provides a rudimentary representation of walking and cycling · is unable to represent the impacts of alternatives to travel such as online shopping and working from home · is based on 2016 conditions, compared with which today's travel patterns are markedly different · and, in predicting an unacceptable 55% increase in congestion, appears not to be well calibrated in its demand response. 	

	<p>The Council has recently commissioned a new strategic model, based on the VISUM software. This has a much improved representation of public transport, but still fails to represent walking or cycling directly. It is based on 2019 conditions and, we understand, is currently being used to assess options for the Local Plan. Until we see the results of those tests we will be unable to judge whether this model's representation of alternatives to travel or of demand response are more realistic. Some time will be needed to assimilate any results which the Council produces from its new model.</p> <p>In response to Question 4.9c, it is important to note that the Transport Topic Paper only assesses impacts in terms of flows, travel times and delays. It says nothing about the other objectives, related to pollution, climate change impacts or accessibility. Given that the predicted 55% increase in congestion is so severe, and flies in the face of the government's "Decarbonising Transport" strategy which also makes the point "<i>We cannot pile ever more cars, delivery vans and taxis on to the same congested urban roads. We want to reduce urban road traffic overall.</i>", we recommend in addition that the further appraisal which we propose above assesses the full range of options against a wider range of objectives, and that the results are consulted on before proceeding further.</p>	<p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf</p>
4.10 What role has the sustainability appraisal had in influencing the distribution of development?	Very little as far as we can tell (see our earlier answer to question 1.4).	
Site selection process	In terms of sub-questions b) – d), we would ask that the Inspectors seek clarification from City of York Council on the methodology used, how the	

<p>4.11 With regard to the sites proposed for all types of development (i.e. housing and non-housing):</p> <p>a) How have the sites been identified, assessed and selected?</p> <p>b) Is the methodology used for each justified?</p> <p>c) What role has the Sustainability Appraisal had in this process?</p> <p>d) Have any site size thresholds been applied in the site selection process? If so, what, how and why?</p> <p><i>For the above question, we ask the Council to set out the site selection process for each different use of sites including housing, employment and education.</i></p>	<p>testing was carried out, what size thresholds, if any, what evidence base was used, and whether they have considered the issues we have covered above.</p> <p>In answer to sub-question d), we suspect that no threshold analysis has been undertaken or that, if it has, it has not informed the selection process. We understand that the developers behind ST7, ST14 and ST15 object to the proposed allocations which they believe are below thresholds of viability.</p> <p>We feel that a threshold analysis/ses are of fundamental importance, and that its/their absence has led to a deeply flawed unsustainable plan, as we have previously outlined under matter 1, in our response to question 1.1. We would ask the inspectors to require the Council to undertake confirmatory work on minimum thresholds along the lines we have suggested in that earlier response and also those required against other necessary criteria for genuinely sustainable new communities, and for these to be incorporated in this plan.</p>	
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