



York Civic Trust

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Inquiry into York's draft Local Plan: Phase 2 Written statement in connection with Matter 6 4th March 2022

This statement in relation to Matter 6 is submitted by York Civic Trust. We have focused on the provision of transport infrastructure, the need for which we have recently assessed in our Transport Strategy for York. We address the questions related to need (6.1, 6.2, 6.8), but do not offer comments on the other questions which relate to finance and delivery, with the exception of a brief comment on Question 6.4.

York Civic Trust is a membership organisation representing some 1300 individuals. Our vision is 'promoting heritage, shaping tomorrow'. Our Mission is to: protect and contemporise York's unique heritage; champion our environment and its sustainability; encourage the city's economic development in line with its character, and engage with all sectors of the community.

This statement has been prepared by Professor Anthony May OBE FREng CEng FICE. Professor May, who chairs our Environment Committee, is Emeritus Professor of Transport Engineering at the University of Leeds. He is an expert on urban transport policy, and has advised the World Bank, the OECD, the International Transport Forum, the European Commission, several national governments, the Houses of Parliament and several UK cities. Professor May will appear at the Inquiry to answer any questions on this submission.

York Civic Trust is committed to helping to secure a Local Plan, based broadly on the current draft. We are concerned, however, that there are weaknesses in the way in which the Plan has been formulated, and aspects of its resulting content, which render it unsound. We have endeavoured throughout the process to work with the City of York Council to secure improvements which overcome these deficiencies. In autumn 2021 we offered to prepare a Statement of Common Ground with the Council, so that our proposals for enhancement could be seen in the context of our strong support for the overall approach. The Council has very recently agreed to do so, but too late for input to Phase 2 of the Inquiry. We hope that our observations can be interpreted in that light.

Patron H.R.H The Duchess of Kent

President Andrew Scott CBE CEng FMA • *Chair* Stephen Lusty • *Chief Executive and Company Secretary* Andrew Morrison

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The Inspectors ask us to:

- explain which particular part of the Plan is unsound;
- explain why it is unsound, having regard to the Framework;
- explain how the Plan can be made sound; and
- explain the precise change/wording that is being sought.

We have endeavoured to do this, though where we have concerns over the process of plan-making, we are clearly unable to answer the last of these. Our explanations for the last two are shown underlined at the end of the relevant sections of our submission.

Question 6.1 What are the key infrastructure requirements for the successful delivery of the housing and economic development planned?

Document EX/CYC/70 lists 12 highway projects and 14 projects related to demand management, public transport and active travel. Appendix 1 of the 2018 Infrastructure Delivery Plan (IDP) provides a longer list. But neither document provides a clear justification for its particular set of infrastructure projects, or any demonstration that they are needed to support the developments proposed in the draft Local Plan. Rather, they appear to be lists of projects which were already in Local Transport Plan 3, or for which funding has more recently been obtained.

Paragraph 4.4 of the IDP states that transport infrastructure is needed for:

- supporting development where it minimises the need to travel and maximises the use of more sustainable modes of transport,
- providing quality alternatives (to the car),
- providing strategic links,
- supporting and implementing behavioural change,
- tackling transport emissions, and
- improving the public realm.

There is, however, no analysis to demonstrate that any of these projects achieves these outcomes, or that they are the most cost-effective ways of doing so.

The 2019 Transport Topic Paper carries out an analysis of the predicted impacts of the planned developments on the simple assumption that patterns of trip-making in the new developments would be similar to those found elsewhere in the city. As noted in para. 4.7 of the IDP, it predicts a 20% increase in trips, a 30% increase in travel time and a 55% increase in delay. This is an outcome which is totally incompatible with the statement in para. 2.16 of the draft Local Plan that the Plan will ensure that ... “growth will not have unacceptable impacts in terms of congestion and air quality ...”. It also suggests a failure to meet the outcomes specified in para 4.4 of the IDP. Yet no subsequent analysis is presented in the Transport Topic Paper to identify appropriate remedial measures or to assess their impact.

Para 4.13 of the IDP states that “the transport infrastructure in Appendix 1 includes transport infrastructure, above that in the ‘do-minimum’ scenario, to support the delivery the Local Plan over a period of 15 years, whilst reducing the level of congestion forecast in the TTP 2018”. Yet no evidence is presented to demonstrate that they would in practice reduce the level of congestion forecast, or that any resulting reduction in congestion would be sufficient to satisfy para 2.16 of the draft Local Plan.

Para 4.18 of the IDP refers to the current Local Transport Plan (LTP3 of 2011), notes that it was by then seven years old, and that “it is likely that it will need to be reviewed in the near future”. Yet four years on, it has still not been reviewed. The Council did commit in January 2021 to publishing a new LTP for consultation by December 2021, and invited York Civic Trust to provide advice on its approach and content. In practice, the publication date has been delayed, and the Council has provided no indication of when it might appear. In order to stimulate a debate on future transport requirements, including those arising from the new focus on carbon reduction, we published our Transport Strategy for York in February 2022, based on the advice which we had offered to the Council.

There is now not time to produce a new Local Transport Plan in time for the completion of the Inquiry into the draft Local Plan in the summer of 2022. However, we consider it essential that the Council does carry out an analysis, as specified in the Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.

That analysis should start with the predictions of substantial increases in travel, travel time and delay, as outlined in para 4.7 of the IDP, identify a broad set of land use and transport measures which would ameliorate those effects, assess the impacts of different packages of measures, and select that set which most cost-effectively meets the objectives specified in para 2.16 of the revised Local Plan.

Such an analysis should inform both the assessment of transport strategy in Phase 4 of the Inquiry, and the selection of infrastructure projects which are being considered in Phase 2. We recommend, therefore, that the Inspectors ask the Council to carry out such analysis as input to Phase 4 of the Inquiry, and that any decisions on the appropriateness of the transport infrastructure projects included in the IDP and EX-CYC-70, and others identified during this analysis, be deferred until then.

Question 6.2 Does the Plan take a justified and suitably evidenced-based approach to infrastructure requirements and delivery? Does it set out the infrastructure requirements arising from the level of growth / new development proposed in the Plan in sufficient detail?

For the reasons set out in our answer to Question 6.1, we do not consider that the Council has adopted a justified and suitably evidence-based approach to the identification of infrastructure requirements. Our recommendation above would enable it to do so.

Question 6.4 Has the cost of these infrastructure elements been estimated reasonably, robustly and with justification and are appropriate and realistic funding sources identified?

As we note in our answer to Question 6.1, we are not convinced that the most appropriate set of transport infrastructure projects has been identified, so the question of appropriateness of cost estimates is premature. However, recent scheme costs suggest that the costs assigned might be seriously inadequate. For example, EX-CYC-70 allocates £4.9m to improvements to active travel throughout the road network other than at the strategic sites. Yet the current active travel scheme on Tadcaster Road has been assigned £1.3m, which has proved insufficient to finance the two major barriers to safe active travel on the corridor. We recommend that, once the most appropriate set of transport infrastructure projects has been identified, they are costed in the light of such recent experience. It would be appropriate to consider such costings further in Phase 4 of the Inquiry.

Question 6.8 In what way does the Plan and its policies provide a clear and effective framework for securing the necessary infrastructure or other obligations to support or mitigate the effects of development?

As we note in our answer to Question 6.1 above, the Council has as yet failed to identify the transport infrastructure necessary to mitigate the effects of development on congestion and pollution. It is therefore premature to be considering a clear and effective framework for the implementation of such infrastructure.