

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

Matter 6 – Infrastructure Requirements, Delivery & Development Viability

Inspector's Question	Our response	References
<p>6.1 What are the key infrastructure requirements for the successful delivery of the housing and economic development planned?</p>	<p>In terms of the transport side of the infrastructure requirement, 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. They also omit an adequate set of measures to mitigate the unacceptable predicted 55% increase in congestion. In our assessment, the proposed road infrastructure investments will not achieve that.</p> <p>Paragraph 4.4 of the IDP states that transport infrastructure is needed for:</p> <ul style="list-style-type: none"> · 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. 	

	<p>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.</p> <p>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 (despite the NPPF and Transport Evidence guidance to do so).</p> <p>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.</p> <p>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”. Our view was that it was already out of date in 2018, as argued in our 2018 submission SID 374. Yet four years on, it has still not been reviewed. The Council did commit in</p>	
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	<p>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, the Civic Trust published its Transport Strategy for York in February 2022, based on the advice which it had offered to the Council (which included input from York Environment Forum).</p> <p>We consider it essential that the Council does carry out the further analysis, as specified in the Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) to:</p> <ul style="list-style-type: none"> - 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. <p>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</p>	<p>A Transport Strategy for York 2022 – York Civic Trust</p>
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	<p>select that set which most cost-effectively meets the objectives specified in para 2.16 of the revised Local Plan.</p> <p>Such an analysis should inform both the assessment of transport strategy and the selection of infrastructure projects. We would therefore ask that the Inspectors accept that, in this regard, the draft Local Plan is as yet not justified, and ask the Council to carry out the necessary further analysis and consequential amendments, etc., including determining the appropriate transport infrastructure projects to be included in the IDP, before we proceed further.</p>	
<p>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?</p> <p><i>Paragraphs 15.14 and 15.15 of the submitted Plan provide a useful starting point. However, it is not sufficiently detailed in order for us to understand the infrastructure requirements for each of the site allocations proposed.</i></p>	<p>No. For the reasons set out in our answer to Question 6.1, and also in the later 8.1, we do not consider that the Council has adopted a justified and suitably evidence-based approach to the identification of transport infrastructure requirements. Our recommendation above would require it to do so.</p>	

<p>6.4 Has the cost of these infrastructure elements been estimated reasonably, robustly and with justification and are appropriate and realistic funding sources identified?</p>	<p>No, primarily for the reasons stated above. However, we do have some specific observations that should also be taken into account.</p> <p>The schemes in annex A page 55/6 item d) radial corridor improvements for walking and cycling, are typically being allocated £0.5m apiece, with a maximum of £1.5m on two corridors. By comparison, in recent experience with Tadcaster Road, it has proved impossible to deal with half of the potential requirements to provide an LTN1/20 compliant scheme within the allocated £1.4m budget; Council would have needed around £3m to do so (we can elaborate if asked).</p> <p>Additionally, only 5 out of the 13 main radials crossing the outer ring road are covered. There is also nothing included at all for orbital LTN1/20 compliant routes, or for providing green links to villages off the main radials. It is clear that the sums allocated for cycling and walking provision are wholly inadequate and need to be revised up very substantially if walking and cycling is to be credibly increased, as is necessary to reduce motorised traffic, congestion and air pollutant and greenhouse gas emissions and deliver a sustainable NPPF compliant plan.</p> <p>The provision for public transport (bus) improvements is equally inadequate. There is an un-costed item for expanding the Park and Rides on page 54, which should be rectified. We note that the Council previously bid for an additional Park & Ride site off Wigginton road (as part of its Access York bid) to pick up traffic from Wigginton, Haxby and beyond, plus provide a direct reverse service for travellers from the city centre and beyond to the Clifton Moor employment and retail /leisure areas. This also allowed for a potential run on to the proposed ST14 site north of Clifton Moor via a bus, cycle and pedestrian subway under the ring road. Set along with our submission suggestion for restoring the original size of ST14 site, this would provide an all round superior transport solution for this key part of the city and the new development, and allow the new site</p>	<p>Tadcaster Rd Sustainable Modes Report.pdf (york.gov.uk)</p> <p>See Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk)</p>
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	<p>residents sustainable access to all of Clifton’s Moors employment, retail and leisure facilities.</p> <p>There is also nothing else proposed specifically for buses, although some provision is buried in other items. The Council's recent £46.5m Bus Service Improvement Plan (BSIP) bid shows the real order of what is required to deliver the sort of step change improvement in the quality of bus provision which would achieve the large shift from private cars required (for the same reasons as above). As we and the York Bus Forum said in our original submissions, many of the bus schemes that were flagged in the current Development Control 2005 version of the Local Plan have been dropped despite being still required as part of steps towards a high quality bus network.</p>	<p>https://democracy.york.gov.uk/documents/s152871/Bus%20Service%20Improvement%20Plan%20Report.pdf And https://www.itravel.york.info/downloads/file/82/york-s-bus-service-improvement-plan</p>
<p>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?</p>	<p>As we note in our answer to Question 6.1 above, the Council has as yet failed to properly identify the transport infrastructure necessary to mitigate the effects of development on congestion, pollution and carbon emissions. It is therefore premature to be considering a clear and effective framework for the implementation of such infrastructure.</p>	