

York Labour Party Phase 2 MiQs Response

Matter 1: Strategic Vision, Outcomes and Development Principles

Inspector's Question	Our response	References
<p>1.1 Does the Strategic Vision, Outcomes and Development Principles set out within Section 2 and provided in policies DP1, DP2 and DP3 of the Plan provide a clear and appropriate framework for the strategic policies set out primarily within Sections 2 and 3 of the Plan?</p>	<p>No, it does not. Starting with the vision, the second section says "<i>The plan will ensure that the vision and outcomes are delivered in a sustainable way that recognises the challenges of climate change, protects residents from environmental impacts and promotes social, economic and cultural wellbeing.</i>"</p> <p>This is far too weak a statement and fails to match the expectations of the NPPF to actively manage these implications.</p> <p>The plan is not sustainable environmentally. It is especially inadequate in the face of the scale of the Climate and Bio-diversity emergencies which require rapid and significant action (see also our comments on Matter 8). On the transport side, there is no credible comprehensive strategy to address existing access problems, leave aside those arising from all the new development. The plan's failure to assess and address alternative options to deal with the massive predicted traffic and congestion growth undermines some of the plans other important objectives such as making use of York Central and reinforcing the strength of the city centre in the prosperity for all section (paras 2.2 and 2.3).</p> <p>The plan is not sustainable economically or socially either. As we said in our submissions SID 364 it fails first and foremost to deliver on the over-riding objective of prosperity for all. It also fails to address the out of control explosion of housing costs (both for purchase and renting), to provide anything like the level of affordable housing, particularly for rent (see our previous submissions and further comments under matters 2 & 3), and it fails to address the City's housing needs for its lower and middle income groups more generally.</p>	

	<p>We suggest that the word “recognises” in the above extract from the Vision statement should be amended to “addresses”, add the words “and biosphere” before “from the environmental impacts”, replace “promotes” with “secures” in the final line and adds “for all York residents” at the end. These amendments should then be reflected in changes to the spatial strategy, and development plan policies regarding the economy, housing and transport, etc., as argued for in our previous submissions.</p> <p>Looking at how the plan seeks to address new housing provision, the vision and outcomes seeks (para 2.5) to ‘provide good quality homes and opportunities’ to achieve a target of 867 dwellings a year’ [which] will include substantial areas of land for garden village development delivering exemplar new sustainable communities at Land West of Wigginton Road (ST14), Land East of Metcalfe Land (ST7) and Land West of Elvington Lane (S: T15). . .’. Policy DP3 sets out the ‘overarching development principles’. They include: ‘[to] ensure that social, cultural and community infrastructure of the new neighbourhoods are met through the provision of accessible facilities and services in a planned and phased manner which complements and integrates with existing facilities’. This all follows NPPF 2012.</p> <p>As we argued strongly in our original submission, we want to see two new larger garden village developments which could be sustainable. We consider that the quantum of development proposed for the strategic housing sites is too small to provide the necessary social, cultural, community and commercially viable public transport provision. Successful garden villages must be self-contained in terms of primary schools, basic shopping, recreational and community facilities, local employment, and good quality public transport and active travel links to major employment sites, shopping, health services and secondary schools.</p> <p>Particularly pertinent to what this means in scale terms was a York Civic Trust (YCT) sponsored workshop in March 2021. It took a detailed look at the principles of sustainable communities and their application to York. It involved</p>	
--	--	--

	<p>comprehensive research into current practice and literature published by expert bodies and academics (see list on right).</p> <p>Following the workshop, YCT published a report titled ‘Sustainable Communities’ (see https://yorkcivictrust.co.uk/sustainable-communities/), which presented a set of recommendations for the City to take forward. The report recommended that the development proposed in the Draft Local Plan, outside the central area of York, “should ideally be replaced by two new communities, each with a population in excess of 15,000, to ensure that the full range of community facilities and services can be sustained.” Their conclusion echoes, albeit in rather more detail, our previous submissions. The YCT report also recommended that such communities should be linked to the rest of the city by sustainable modes of travel and with maximum travel times. The new communities should comprise a range of tenure types and dwelling types built at mixed densities averaging around 50dpa.</p> <p>To illustrate this further we have looked at two key aspects, education provision and public transport. Looking at education provision first, York currently has 49 primary schools and 10 secondary schools in the public sector for its 208,000 population (one primary per 4,245, and one secondary per 20,800 population). Nationally there is roughly one primary school for every 3,300 population and one secondary school for every 16,350 population, i.e. school sizes of 281 and 986 pupils respectively, so York’s school sizes are already relatively high.</p> <p>If we adjust for whole class sizes for a small 210 1 Form Entry (FE) primary size gives a population of 2,465 which equates to 1070 dwellings at a 2.3ppd ratio. A more typical and more economic 2 FE primary would match a 2140 dwelling settlement. A minimum 3FE secondary of 750 pupils requires a 12,430 population equating to 5,400 dwellings. A more typical 4FE secondary requires a 16,575 population which equates to 7,200 dwellings.</p>	<p>Uxcester garden city, 2014 Wolfson Economic Prize, 2014. Garden Cities and Garden Towns: Visions and Reality, Transport for New Homes, 2020. Transport for New Homes : Project Report and Checklist, 2018. 20-Minute Neighbourhoods: Creating Healthier, Active, Prosperous Communities, TCPA, March 2021. 20-Minute Neighbourhoods: Implementing 20-Minute Neighbourhoods in Planning Policy and Practice, RTPi Scotland, March 2021.</p>
--	---	--

	<p>Turning to public transport provision, the Chartered Institute of Highways & Transport’s 2018 “Buses in Urban Development” Document states in its key messages “New developments should be sufficiently compact or dense to generate demand that will support high frequency bus services with long-term viability”.</p> <p>Its advice on service levels includes: To attract a high mode share of trips, and to meet the sustainability objectives set out in planning policy, the aim should be to provide a service pattern with:</p> <ul style="list-style-type: none"> • 7-days-a-week service; • Early mornings and late evenings covered; <p>People also prefer timetabling and frequencies that offer:</p> <ul style="list-style-type: none"> • Frequency minimum every 20 minutes in urban areas, with 10 minutes the target, and 5–6 minutes the target for core routes and corridors. <p>It notes that a seven-day service may be seen as an onerous requirement, but without it, there is little chance of enabling people to live without a car. Moreover, travel demand has changed over the years, and there are now far more shops and other facilities open on Sundays. (Latter is particularly true in York)</p> <p>Examination of bus service provision to out of city settlements around York not located on major road corridors shows that in terms of being able to deliver high quality commercial bus services (max 15 minute daytime, 30 minute evenings and Sundays) only Haxby / Wigginton (population circa 12,000) and Strensall (population circa 6,000) meet this target in terms of a direct service to the centre of York. However only Haxby / Wigginton has a service to the two major out of town employment / retail / leisure sites in their quadrant at Clifton Moor and Monks Cross, and that is only a non-commercial Mon-Sat daytime hourly service.</p> <p>This reinforces the Civic Trusts conclusion that a 15,000 target for a new community outside York, which could support a new secondary school as well as primaries, and a high quality commercial public transport offer is about right. At a density of 2.3 people per dwelling that suggests a settlement size of 6,500</p>	<p>CIHT - BUSES BROCHURE 2018_cs4.indd</p>
--	--	--

	<p>homes, which would also broadly match a 3 FE secondary, and three 2FE or two 3 FE primary schools. None of the proposed new settlements are anywhere near this size. ST15, the largest, will eventually, post the plan period, achieve just half that, supporting our case for two new much larger settlements. We'd suggest would be better if aimed at a more typical and economic 4 FE secondary – i.e. a 16,600 population, 7,200 homes settlement.</p> <p>Even if the inspector is willing to accept only a case for a basic public transport connected small settlement, with just primary school provision, the evidence from the next two smaller settlements outside the main York urban area of Upper & Nether Poppleton (combined population 4,100) and Stamford Bridge (population 3,500) is that they only have a basic weekday daytime commercial ½ hourly services, and an 1 hour 10 minute Sunday service. However weekday evening services (½ hourly early, 1 hourly later) require subsidy. Smaller communities struggle with providing Sunday services too. This suggests an absolute minimum population figure of 4-5000 for any chance of basic 7 day a week and weekday evening commercial bus services., i.e. a minimum settlement size of around 2,000 homes, say 2150, taking the 2FE primary school criterion into account. Only the west of Elvington site ST15 eventually achieves this scale near the end of the plan period.</p> <p>The vision and development policies, and subsequent allocations, need amending, to reflect the realities of how sustainable communities can be realistically delivered.</p> <p>This also highlights the consistent weakness of this Plan in that, contrary to the twelve Core Planning Principles of NPPF12, para 17, it gives insufficient consideration to the relationship between land use and transportation, and consequent environmental (including air quality and climate change) impacts. Para 17 requires that it 'actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'. This is</p>	
--	--	--

	<p>reinforced and expanded on in section 9 of the 2012 NPPF and in the Government Guidance on “<i>Transport evidence bases in plan making and decision taking</i>”. This plan fails to do this as we have argued in our previous submissions.</p> <p>As we covered in our submission PM2 SID 364, we would commend the approach and many of policies adopted in the Oxford Local Plan to address these challenges (e.g. Policy RE2 on the efficient use of land, and section 9 on Efficient Movement), and the background transport assessment and policy work that went on broadly in parallel (see list of studies reference) towards producing the Oxford Transport Strategy. This is the approach York should have been following. Oxford faces many of the same problems as York, and with the designation of a permanent green belt for York, we are likely to follow them in terms of their amplification over time. The new York Local Plan should recognise the appropriate policy responses - transport policies that put active travel and public transport first, demand management measures to keep traffic levels down to the road network’s (as enhanced) free-flow capacity, high housing densities, local facilities and services and non-car based layouts that will facilitate this.</p> <p>We ask the inspector to also commend the Oxford Approach to the Council to take into account in of consequential work from amending the vision and development policies along the lines we have suggested above, and from the necessary further transport and housing work we proposed in our previous submissions, and touched on in later answers here.</p>	<p>Transport evidence bases in plan making and decision taking - GOV.UK (www.gov.uk)</p> <p>OCC Oxford 2036 Adopted single pages (1).pdf</p> <p>https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/area-strategies</p>
<p>1.2 Are the Development Principles set out in the Plan justified, effective and in accordance with national policy?</p>	<p>No, they are not adequately justified, and the development policies are inadequate.</p> <p>As we indicated in our submissions, and in our response to question 1.1 above, sustainable development (SD) needs to be of mixed use, high density, designed around high quality walking areas and cycling routes, with those routes providing short, safe and convenient links to a core set of community facilities including schools, shops, leisure facilities and personal services. These principles need</p>	

	<p>writing into policies DP2 & DP3 as fundamental requirements, rather than, as the current policies do, simply suggesting that they are desirable.</p> <p>For example, Policy DP2 ii) does mention schools, but not the other local facilities we list above that are necessary for any genuinely sustainable local community. In terms of the additional schools the growth of the city will require, no allocations of land for primary or secondary education are made, even in the proposed new garden village communities. Neither is an allocation made for a new secondary school, which the overall growth in population would potentially justify. The implication is that the Council will end up cramming more pupils into existing schools. Most of the existing secondaries, and a good few primaries have already been previously expanded within their existing sites, one reason they are already large against national averages (see our response on 4.11) and further expansions on already cramped sites with no ability to add new playing fields, etc., is simply the wrong answer.</p>	
<p>1.3 Is the overall strategic approach, in terms of the vision, outcomes and principles relating to development, its management and delivering the Plan's development requirements positively prepared, justified, effective and consistent with the Framework?</p>	<p>No. The overall strategic approach has not been justified by the analysis which underpins the draft Local Plan. To be clear, we understand "justified" to mean "the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence" (NPPF, 2012, para 182). Our concerns are with the location, density and scale of new development, the incompleteness of the design principles, the assessment of the transport implications of the development, and the failure to consider alternative strategies for mitigating those impacts. These are all issues on which we will comment in more detail under Matter 4.</p> <p>The location and scale of new development, as we have highlighted already, does not follow the sustainable development ambition, making a number of inadequately sized allocations that can only operate as car based dormitories.</p> <p>The design principles for new developments again do not comprehensively or adequately detail what's required for sustainable low carbon, low car use, high quality public transport, walking and cycling linked development, which we have</p>	

	<p>touched on in our original submission and previous answers, and pick up further in matters 4 & 8.</p> <p><u>The objectives against which the transport assessments are made</u></p> <p>Para 2.16 of the draft Local Plan sets out the transport-related objectives which any assessment should consider. As we noted in our submission in 2018, this list is somewhat incomplete. In particular it says nothing about accessibility, or equitable provision of access. Neither does it mention climate change, which the Government now expects to be central to any Transport Plan. We recommend that these are included in this paragraph and addressed in the assessment.</p> <p><u>The options considered in the transport assessments</u></p> <p>Para 2.16 specifically states that the Plan will ensure that ... “growth will not have unacceptable impacts in terms of congestion and air quality ...”. Policies DP1, 2 and 3 all refer in different ways to the need to deliver a fundamental shift in travel to more sustainable modes, albeit not sufficiently robustly, as already indicated. Policy DP3 refers specifically to minimising “the environmental impact of vehicle trips to and from the development”. We strongly support all these aspirations. Yet the only analysis of these potential impacts comes in the Transport Topic Paper, which simply predicts the impacts of new development on the road network on the assumption of no remedial measures. Its prediction of a 55% increase in congestion as a result is clearly not evidence of growth which “will not have unacceptable impacts in terms of congestion”.</p> <p>The analysis in the Transport Topic Paper is flawed because it takes no account of any demand response to such delays. It also fails to satisfy the Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) that any such assessment should:</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>Our concern is that, had the Council carried out such an assessment of remedial measures it would have been able to demonstrate that a pattern of development could be achieved which would, in the words of para 17 of the 2012 NPPF, “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.</p> <p>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 amendment, etc., before we proceed further.</p>	
<p>1.4 Has the Plan been informed by an adequate process of Sustainability Appraisal and Habitats Regulations Assessment in this regard?</p>	<p>No. It seems clear from the inadequacies of the sustainability aspects of the plan (which we have identified in our submissions and in other comments here), that it has been carried out in name only – there is no evidence it has led to any meaningful change in the overall approach of the plan.</p>	