

CITY OF YORK LOCAL PLAN
PHASE 2 HEARINGS
CYC INFRASTRUCTURE UPDATE NOTE
RESPONSE BY FULFORD PARISH COUNCIL
MAY 2022

General

- 1 The Update Note (EX/CYC/79) paragraph 3 says that it “updates and supersedes the Infrastructure Delivery Plan 2018 [SD108] and subsequent clarifications published as part of the evidence base for the Local Plan including most recently the Key Infrastructure Requirements Updated GANTT Chart [EX/CYC/70a].” As such, the Note constitutes a very important part of the evidence base of the Local Plan and should be subject to much wider consultation than just with Matter 6 participants.

- 2 Fulford Parish Council (FPC) is also concerned about the late production of this Note (and other key evidence supporting the Local Plan). It fully understands that the evidence accompanying the Submitted Local Plan (SLP) may need to be amended or updated in the light of changing circumstances such as new sub-national household projections or altered economic conditions. However, in this case, CYC is using the very extended time period of the Examination process (now over 4 years) to try and plug the gaps which existed in the original Submission evidence base. This is contrary to Government guidance. The relevant PPG (12-014) makes clear that evidence should not be produced retrospectively in order to justify policies and proposals which have already been submitted, saying:

“The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.”

Traffic Congestion

- 3 EX/CYC/79 (para 18) accepts that the key radial routes within the city and the A1237 all suffer from delays and congestion. The same paragraph also concedes that there are particular problems on Fulford Road and Wigginton Road of “high levels of congestion on a day-to-day basis.” Importantly, these two radials are also the same roads which SLP Table 15.1 shows as experiencing the greatest increases in traffic congestion as a result of the Local Plan proposals.

Despite this, EX/CYC/79 contains no costed proposals to mitigate impacts on the two roads, simply saying about Site ST15 (para 25 last bullet point):

“Inevitably the development will increase traffic volumes on Fulford Road, but modelling work is ongoing to consider options to mitigate this impact.”

However, previous work by CYC undertaken for the Germany Beck Fulford development found little scope to mitigate the highway impacts of this now committed 650 dwelling development.

New Traffic Modelling

- 4 EX/CYC/79 (para 23) states that “initial indications” from the VISUM modelling are that changes from the 2019 base are smaller scale than forecast from 2016 and there are fewer severe impacts. However such “initial indications” can only be treated as speculative until the results of the new modelling work is published. Little weight can be given to them. In reality paragraph 23 appears to be a response to the evidence of FPC and others which highlighted the unacceptable highway impacts shown by SLP para 14.15 and Table 15.1.
- 5 FPC also notes that the new modelling has an end-date of only 2033. This is clearly inappropriate for a plan which makes allocations to 2038 and beyond. The full traffic implications of these developments need to be taken into account and not just those to 2033.

Required Highway Works for Site ST15

- 6 EX/CYC/79 suggests that a different access strategy is now being proposed for ST15 but the new strategy is nowhere set out. However EX/CYC/79 hints that it will involve much greater levels of development being accessed off B1228 Elvington Lane, especially in the earlier phases of the development. The existing B1228 is a relatively narrow rural road with some very tight bends. It also has a very difficult junction with A1079 Hull Road where there are significant delays at peak times. Any upgrade of this junction would be very costly and is likely to involve land not in the control of the developer.

Sustainable Transport for ST15

- 7 EX/CYC/79 (para 18) says that ST15 “is well located in relation to the University bus service-most frequent and highest capacity in the city.” In fact, the nearest boundary of ST 15 is some 2km from the University East Campus and is separated by a wide belt of open countryside as well as the A64. This is hardly “well located.” Moreover, if the earlier phases of ST15 are developed off Elvington Lane, the University bus service could not extended into the site. A bus route using Elvington Lane would be much longer and less attractive for users.

- 8 EX/CYC/79 (para 25) says that a segregated bus route over the A64 will be provided to ST15, presumably as part of the proposed grade separated junction. However such a segregated route would add significantly to the cost of the junction which does not seem to be taken into account in its costing.
- 9 EX/CYC/79 (para 27) says that "a further ST15 Sustainable Transport Study is considering options for walk/cycle links between ST15 and existing built-up areas." However the northern edge of the proposed development is some 2 kms from the southern edge of the built-up area. This distance is well beyond the "acceptable maximum" for journeys by foot as set out in the IHT Guidelines for Promoting Journeys on Foot. Similarly both the City Centre and the bulk of York's employment areas are well beyond the 5km distance which is generally accepted as the maximum for which cycling is a viable option for most people.
- 10 The only real conclusion from EX/CYC/79 is that ST15 would be heavily car dependent.

Education

- 11 EX/CYC/79 highlights the difficulties of providing new schools within the earlier phases of large developments, saying:

"The yield analysis evidences the financial risks of providing a new school too early in a development. High running costs would be an unacceptable financial burden on other school budgets within the successful Multi-Academy Trust's portfolio. There would also be a risk of a new school failing to attract staff and pupils in the medium and long-term. If necessary, expansion or temporary provision nearby should be considered for the early years of a development...This is likely to be a particular issue for the largest of the sites with extended build out periods."

- 12 EX/CYC/79 Appendix 1 notes that there will be a particular problem of school provision in the early phases of ST15 saying (1.05):

"Temporary provision nearby should be considered for the early years of a development. This may increase the pre-/post opening costs."

This problem is probably why the GANTT Chart (EX/CYC/70a) shows the primary school on ST15 as being only provided by the end of 2031/32 after 780 dwellings have been completed. Such late provision is incompatible with the requirement of Policy SS13(x) which says:

"New nursery, primary and potentially secondary provision will be required to serve the earliest phases of the development."

The late phasing of on-site primary school provision will make ST15 even more car-dependent, especially in the period when travel patterns are being established.

Other Community Facilities

- 13 Like the primary school, EX/CYC/79 shows the community hall/space as being provided by 2031/32 which is almost at the end of the plan period. There is also no reference to the other community facilities required to make the development sustainable such as a local shopping centre or GP surgery. This is despite the requirement of Policy SS13(ix) that these facilities should be provided "early in the scheme's phasing in order to allow the establishment of a new sustainable community."

Viability and Costings

- 14 EX/CYC/79 Appendix 1 shows the costings of the infrastructure which have been input to the latest viability assessment which accompanied CYC's Matter 6 Statement.
- 15 In respect of ST15, FPC considers that some of these costings are too low whilst other key items of infrastructure have not been costed.
- 16 FPC has already queried Items 2.10a and 2.10b (the Grade Separated Junction) but is content to await a costing for a DMRB-compliant junction if one can be achieved.
- 17 The full development of ST15 will put great pressure on the Grimston Interchange. However the complex configuration of this junction makes it very difficult to achieve significant increases in capacity without very costly engineering works. A developer contribution of only £3million is unlikely to achieve any significant improvements.
- 18 The access road linking ST15 with the A64 grade separated junction is costed at only £5 million (2.10d). Remarkably this is the same cost as the access road for ST14 to the A1237 (2.09b) despite the fact that it is twice the length at 1.5km. Both figures cannot be correct. The actual cost is likely to be at least £12 million.
- 19 The bus subsidy (2.10g) is only costed at £2 million. This would not produce the high frequency service required by Policy SS13, especially if the only access to the site in the earlier phases is from Elvington Lane.
- 20 The proposed community hall is costed at only £0.9 million. This is the same as the cost for community halls for other strategic sites despite the fact that it will have to serve a much larger population. A significantly higher cost should be allowed for.
- 21 Appendix 1 provides no costing for the following important items of infrastructure required for ST15:
- Improvements to the A19/A64 junction as required by the SoCG with National Highways.

- Mitigation works to the A19 and A1079 including air quality measures.
 - Nature conservation mitigation works (5.07).
 - Developer contributions to allow the early provision of the proposed shops, medical centre and other community facilities.
- 22 The Porter Viability Assessment showed that ST15 had only marginal viability. With realistic costings and the addition of the omitted infrastructure items, the only possible conclusion is that ST15 is unviable at the current time.
- 23 Since the base date of the Porter Viability Assessment, there has been massive inflation of construction costs. As a result, a recent local press report (25/05/2022) records the Corporate Director of Places, Neil Ferris, as telling the May meeting of the Customer and Corporate Services Scrutiny Management Committee that "spiralling inflation presents a 'significant and growing risk' for major council building projects across York as the costs of some materials are rising by more than 20 per cent." He is also recorded as saying that any project that is not yet under contract is at risk of having to be reconsidered. In this light, and the predictions that nationally house prices may fall over the next few years, it is important that the conclusions of the Porter Viability Assessments are revisited before the end of the Examination process.