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York Civic Trust Inquiry into York's draft Local Plan: Phase 2 Supplementary statement on paper EX/CYC/79 in connection with Matter 6 26th May 2022

This statement in relation to Matter 6 is submitted by York Civic Trust. It should be read in conjunction with our statement submitted by the due date of 4th March 2022. In both documents we have focused on the provision of transport infrastructure, the need for which we have recently assessed in our Transport Strategy for York.

The focus of this supplementary statement is the paper EX/CYC/79: *Local Plan Infrastructure Delivery Strategy: Update Note for Phase 2 Local Plan Independent Examination*, which the Council only submitted on 18th May, eleven weeks after the due date for submissions for Phase 2 of the Inquiry. In doing so the Council failed to alert those who were already registered to speak at the session on Matter 6, even though that was to be held only four working days later, and the list of speakers was already known to the Council. As a result, our representative was left to download and assimilate the document once the meeting had started. We are grateful to the Inspectors for allowing further written responses in the light of this wholly unsatisfactory procedure. We hope that the Inspectors will issue instructions to avoid any recurrence in Phases 3 and 4 of the Inquiry.

In practice, EX/CYC/79 does not appear to offer much that is new. It reiterates the statement that measures are included "to ensure transport impacts of new development are mitigated; including reducing demand on the road network through infrastructure projects to deliver a significant modal shift towards walking, cycling and bus travel". However, as we noted in our earlier submission, no evidence is offered that any of the schemes included will mitigate the impacts of new development or reduce demand on the road network.

EX/CYC/79 provides more detail than EX/CYC/70a on the measures to be provided to support strategic sites ST4, 5, 7, 8, 9, 14, 15, 17 and 37. These include 15 highways projects with a total notional cost of £242m, bus access improvements to ST7, 14 and 15 totalling £3.5m, and walking and cycling access to ST14 and 15 totalling £6m. When we raised the question of the imbalance of these modal allocations at the hearing, we were told that the highways improvements will support bus and active travel access.

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While true, it is disingenuous to suggest that they will be major beneficiaries. There is ample evidence that highway capacity investment on the scale suggested will lead to an increase in demand on the road network, which will in turn adversely affect bus service reliability and attractiveness. Active steps will be needed to avoid such an outcome, and these should include greater investment in infrastructure for buses, walking and cycling. As an example of the investment which might be made, para 25 states that “a segregated route [for buses] over the A64 will be provided to ST15”. Yet this does not appear in the list of proposed infrastructure measures. We recommend that it should be included, with an appropriate cost allocation to be met by developers.

The document also provides some notional costs for more general measures. We welcome the commitment to additional funding for bus services, park and ride and demand management. However, we are concerned that the document does not include additional funds for active travel. Cycling levels in York have declined significantly since 2014 (while flows were increasing nation-wide), and the Council has been slow to deliver a Local Cycling and Walking Infrastructure Plan (which the government requested in 2017) or to spend the government’s 2020 Active Travel Moneys. More recently it has been unsuccessful in attracting significant further allocations in the latest funding round. A much larger sum than the £4.9m allocated will be needed if the Council is to achieve its planned 33% growth in active travel by 2030.

We remain, therefore, of the view expressed in our earlier submission. As we noted then, 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.

Yet none of these documents provides any analysis to demonstrate that any of the projects listed achieves these outcomes, or that they are the most cost-effective ways of doing so.

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 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. Given the latest information in EX/CYC/79, it is even more important that this analysis demonstrates that the balance of expenditure between highways improvements, bus service enhancements and provision for active travel is effective in mitigating the transport effects of the new development, reducing demand for use of the highway network and, to quote EX/CYC/79, “delivering a significant modal shift towards walking, cycling and bus travel”.

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, EX-CYC-70a and EX-CYC-79, and others identified during this analysis, be deferred until then.