

## **CYC Response to Representations on EX/CYC/79 following Phase 2 hearings**

**15 June 2022**

### **Background**

1. The City of York Council (CYC) produced a Local Plan Infrastructure Delivery Strategy: Update Note for Phase 2 York Local Plan Independent Examination (Examination Library Reference EX/CYC/79), published to the examination library on 18th May 2022, and was discussed at hearings on 26th May 2022. The Inspectors provided an opportunity for further responses by 31 May 2022 to allow participants further time to respond. CYC was in turn requested to respond in writing to these further submission by about 10th June 2022. This note provides a response to the comments received.
2. As a general comment, many of the representations received were raised during the Phase 2 hearings and CYC's response to them was explained at the time. Nonetheless, CYC summarises its position in response to the written representations below.

### **Submissions Received**

3. The following responses have been received in relation to EX/CYC/79:
  - *HS/P2/M6/IR/2a York Civic Trust*
  - *HS/P2/M6/IR/3a York Bus Forum*
  - *HS/P2/M6/IR/5a York Environment Forum*
  - *HS/P2/M6/IR/7a Fulford Parish Council*
  - *HS/P2/M6/IR/14a York Labour Party*
4. A further submission was also received from Defence Infrastructure Organisation (HS/P2/M6/IR/4a) which is not a response to EX/CYC/79. The content of this further relates exclusively to viability testing of Policy GI2a viability testing which was both appended to CYC's Matter 6 hearing statement and the subsequent update ((HS/P2/M6/IR/1b(i)). Both of these documents were available well in advance of Phase 2 hearings (Day 7). This submission is therefore not addressed in this note as it does not relate to EX/CYC/79. CYC's position is in any case set out in clearly in HS/P2/M6/IR/1b(i) which does not refer "proposed planning obligation" as stated in Defence Infrastructure Organisation's submission and makes clear that these estimates are of potential development costs for the purpose of testing the Local Plan (see paragraphs 36 – 37).

## Council's Response

5. The further submissions received related to EX/CYC/79 challenge the costs assumptions used and CYC approach to modelling and analysis of transport impact. Issues are also raised about deliverability of ST15, especially as it relates to sustainable transport provision. CYC consider that these submissions **do not** raise soundness matters in respect to the Plan, nor do they undermine CYC's infrastructure evidence or approach to updates.
6. CYC remains of the view that:
  - As outlined in our Matter 6 hearing statements and appended viability evidence (HS/P2/M6/IR/1b(i)) and set out in the Infrastructure Delivery Strategy: Update Note EX/CYC/79 paragraph 14:
    - Assumptions used in the infrastructure evidence are robust and, where estimates, are based on technical advice and appropriate benchmark costs.
    - These costs have been appropriately tested in CYC's viability evidence with conservative assumptions applied
  - The proposed Garden Village at ST15 Land West of Elvington Lane, supported by Homes England as part of the Government's national programme, is supported by evidence on its viability (see Appendix 2 to Matter 6 of the hearing statements (HS/P2/M6/IR/1b(i)), paragraph 48 - 49).
  - As set out in EX/CYC/79, CYC is actively working with National Highways to identify mitigation is required on the Strategic Road Network and once agreed updated in CYC's Infrastructure Delivery Plan, the intention for which is that it is kept up to date over the life of the Plan.
7. The points raised in the submission are summarised and responded in greater detail in Appendix 1. A further Infrastructure Update Note will, in a Gantt chart format requested by the Inspectors, will be provided alongside. This will align with and be supplemented by further details of the transport modelling discussed in Phase 2 including as it relates to site allocation ST15 Land West of Elvington Lane. It will also be accompanied updated statement of common ground with Highways England as discussed at Phase 2 hearings.

## Appendix 1: Summary of Submissions and CYC Responses

Representee	Summary (see original submission highlighted above for full text)	CYC Response
<b>Fulford Parish Council</b>	<p>The EX/CYC/79 update constitutes a very important part of the evidence base and should be subject to much wider consultation than just with Matter 6 participants. CYC is using the extended Examination time period to “plug gaps” in Submission evidence. This is contrary to Government guidance which states evidence needs to inform the Plan and development and not be collected retrospectively (see PPG 12-014).</p>	<p>Evidence on infrastructure need and planned provision has informed Plan development and is also intended to support its implementation as set out in EX/CYC/79, paragraph 10. The updates to infrastructure evidence supplied by CYC since submission respond to request for the updates from the Inspector which in turn reflect factual changes to delivery dates, funding and capacity in existing provision. EX/CYC/79 does not reflect a change in evidence or Plan strategy, it clarifies the approach, Indeed the responses from the Civic Trust highlighted elsewhere in document suggest there is not a lot new in it. Best practice guidance, including from the Planning Advisory Service, advocates treating Infrastructure Delivery Plans as live documents which are regularly updated. Any proposed modifications to the Plan are in any case subject to formal consultation mirroring that at the Regulation 19 stage of the Local Plan and in line with relevant policy and guidance. FPC fails to understand that local plan examinations (and SA/SEA) is a responsive exercise and does also need to be updated as it progresses especially where, as here, the timescale of the plan justifies it.</p>
<b>Fulford Parish Council</b>	<p>EX/CYC/79 (para 18) accepts that the key radial routes suffer from delays and congestion including Fulford Road and Wigginton Road on a day-to-day basis. Plan Table 15.1 shows these two radials experiencing the greatest increases in traffic congestion resulting from Plan proposals. Despite this, EX/CYC/79 contains no costed proposals for Site ST15. Previous work by CYC for the 650 dwelling Germany Beck, Fulford development found little scope to mitigate the highway impacts.</p>	<p>EX/CYC/79 is based on high-level estimates of likely cost by CYC’s technical officers and most significant intervention (the junction at the A64) has which has been further validated by work by WSP as identified in Appendix 1. As set out in paragraph 26 work with Highways England continues and A further finer grained and site-specific finding from transport analysis as it relates to ST15 will be published in readiness for Phase 3 hearings as indicated during Phase 2 hearings.</p>
<b>Fulford Parish Council</b>	<p>EX/CYC/79 (para 23) states that “initial indications” from the VISUM modelling are that changes from the 2019 base are smaller than in from 2016 with fewer severe impacts. Until results of the new modelling work is published, little weight can be given to this.</p>	<p>The position is as stated in EX/CYC/79 (paragraph 23) and as set out in the Statement of Common Ground between CYC and National Highways (EX/SOCG/10), CYC will agree with NH where mitigation is required on the SRN to support Local Plan development and will develop mitigation which will then be tested in the mesoscopic model and once agreed updated in the IDP.</p>
<b>Fulford Parish Council</b>	<p>The new modelling has an end-date of only 2033. This is inappropriate for a plan which makes allocations to 2038 and beyond and the full traffic implications of these developments need to be considered and not just those to 2033.</p>	<p>To clarify, the transport modelling being undertaken to cover the whole period identified in the Plan, with forecasting through to 2040.</p>

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<b>Fulford Parish Council</b>	EX/CYC/79 suggests that a different access strategy is now being proposed for ST15, but the new strategy is nowhere set out. 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 tight bends and a very difficult junction with A1079 Hull Road where there are significant delays at peak times. An upgrade of this junction would be very costly and is likely to involve land not in the control of the developer.	EX/CYC/79 paragraph 12 states the secondary access via Elvington Lane will be required for ST15 based on the latest analysis – this is not a new strategy and the potential for this was provided for in Policy SS13.
<b>Fulford Parish Council</b>	The nearest boundary of ST15 is 2km from the University of York East Campus and separated by a wide belt of open countryside as well as the A64. This is not “well located in relation to the University bus service- most frequent and highest capacity in the city” as suggested in EX/CYC/79 (para 18) If the earlier phases of ST15 are developed off Elvington Lane, the University bus service could not be extended into the site. A bus route using Elvington Lane would be longer and less attractive for users. A segregated bus route EX/CYC/79 (para 25) over the A64 to ST15, would add significantly to the cost of the junction which does not seem to be considered.	The proximity of the site to the University of York – which has the highest frequency bus services – provide opportunities to expand the service and at a lower cost than might be provided otherwise should they have been located further away as was explained during Phase 2. Indicative costs for sustainable transport measures are clearly included in Appendix 1 of EX/CYC/79 (for example, 2.10h and 2.10g). As noted in paragraph 27, a further ST15 Sustainable Transport Study is in progress and is considering options for walk/ cycle links between ST15 and existing built-up area In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes.
<b>Fulford Parish Council</b>	The northern edge of ST15 is 2 kms from the southern edge of the built-up area and the “acceptable maximum” for journeys by foot as set out in IHT guidelines. The City Centre and the bulk of York’s employment areas are beyond the 5km distance accepted as the maximum for which cycling is a viable option for most people. ST15 would be heavily car dependent.	The <a href="#">IHT Guidelines for Promoting Journeys on Foot</a> , dates back to 2000, pre-dating NPPF 2012. It highlights ‘suggested’ distances for commuting and it references a ‘preferred’ maximum of 2km. It does not prescribe acceptable walk distances and in fact acknowledges this will depend on a range of factors. Of course, all journeys within the site will be below the 2km threshold. The Plan sets out a policy to provide sustainable travel pattern on this site, through walking, cycle and bus use. As noted in EX/CYC/79 paragraph 27, a further ST15 Sustainable Transport Study is in progress and is considering options for walk/ cycle links between ST15 and existing built-up area – at all development phases. In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes for development management purposes.
<b>Fulford Parish Council</b>	The late provision of schools show in EX/CYC/79 and the GANTT Chart (EX/CYC/70a) is incompatible with the requirement of Policy SS13(x) for provision in the earliest phases of the development. Late phasing of on-site primary school provision will make ST15	School provisions will be included at the earliest phases where it is required and feasible to meet demand on sites. As noted in EX/CYC/79 paragraph 27, a further ST15 Sustainable Transport Study is in progress and proposes options for walk/ cycle links between ST15 and existing built-up area – at all development phases – and using already existing infrastructure such as two

Representee	Summary (see original submission highlighted above for full text)	CYC Response
	even more car-dependent, especially in the period when travel patterns are being established.	low traffic route bridges over the A64. In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes for development management purposes.
<b>Fulford Parish Council</b>	EX/CYC/79 shows the community hall/space as being provided by 2031/32 at the end of the plan period. There is no reference to the facilities required to make the development sustainable e.g. a local shopping centre or GP surgery despite the requirement of Policy SS13(ix) for early provision to create sustainable communities.	The community hall space will be required when the population is at a number as to allow use of it – early delivery in the absence of demand – is not appropriate. EX/CYC/79, paragraph 14 identifies S106 standard cost applied in appraisals which is £4,200 per unit based on historic receipts (and index linked to reflect increases since the 2018 data). This effectively to cover the additional costs of social and community infrastructure and local environmental mitigation measures – the exact specification and requirements for which will need to be assessed at the application stage and secured in line with Policy DM1. This cost is in addition to the cost of onsite school provision (and potential opening up to community uses of these school provision may supplement this provision)
<b>Fulford Parish Council</b>	EX/CYC/79 Appendix 1 shows the costings in respect of ST15, FPC are too low and key items of infrastructure have not been costed.	CYC does not agree – indicative costs have been tested along with ‘opening up costs’ for the site (see paragraph 14 of EX/CYC/79 and Appendix 1)
<b>Fulford Parish Council</b>	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.	CYC does not agree – indicative costs have been tested along with ‘opening up costs’ for the site (see paragraph 14 of EX/CYC/79 and Appendix 1)
<b>Fulford Parish Council</b>	The full development of ST15 will put great pressure on the Grimston Interchange and 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.	CYC does not agree – indicative costs have been tested along with ‘opening up costs’ for the site (see paragraph 14 of EX/CYC/79 and Appendix 1)
<b>Fulford Parish Council</b>	The access road linking ST15 with the A64 grade separated junction is costed at £5 million (2.10d); the same this as the access road for ST14 to the A1237 (2.09b) despite being twice the length at 1.5km. Both figures cannot be correct, and the actual cost is likely to be at least £12 million.	CYC does not agree – indicative costs have been tested along with ‘opening up costs’ for the site (see paragraph 14 of EX/CYC/79 and Appendix 1). CYC further notes that the costs at ST14 are higher due in response to site specific issues at this site, rather than the costs at ST15 being depressed). Additionally, the costs of the junction with the existing road network (required for both sites and a major component of the costs) is included in the GSJ cost for ST15, but the roundabout spur to ST14 is

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		within the “access road” costs. Hence the costs are not in practice comparable.
<b>Fulford Parish Council</b>	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.	As noted in EX/CYC/79 paragraph 27, a further ST15 Sustainable Transport Study is in progress (as explained during Phase 2) and is considering options for walk/ cycle links between ST15 and existing built-up area – at all development phases. In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes for development management purposes.
<b>Fulford Parish Council</b>	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 having to serve a much larger population. A significantly higher cost should be allowed for.	The community hall space will be required when the population is at a sufficient number as to require use of it – early delivery in the absence of demand – is not appropriate. CYC would further not that as set out in EX/CYC/79, paragraph 14 tween a S106 standard cost applied in appraisals which is £4,200 per unit based on historic receipts (and index linked to reflect increases since the 2018 data) to cover the additional costs of social and community infrastructure. This is in addition to onsite school provision (and potential opening up to community uses of these school provision may supplement this provision).
<b>Fulford Parish Council</b>	Appendix 1 provides no costing 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.	EX/CYC/79, paragraph 14 identifies S106 standard cost applied in appraisals which is £4,200 per unit based on historic receipts (and index linked to reflect increases since the 2018 data). This effectively to cover the additional costs of social and community infrastructure and local environmental mitigation measures – the exact specification and requirements for which will need to be assessed at the application stage and secured in line with Policy DM1. This cost is in addition to the cost of onsite school provision (and potential opening up to community uses of these school provision may supplement this provision. For the A19/ A64 junction, the modelling shows the mitigation is needed is addressing issues experienced now, hence is not related to Local Plan growth and is accordingly not within the LP infrastructure requirement – although it will form part of CYC’s Local Transport Plan capital works going forward. This was addressed in CYC’s Phase 3 comments.
<b>Fulford Parish Council</b>	The CYC 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.	The ST15 testing in HS/P2/M6/IR/1b(i) sensitivity testing and making necessary contextual updates to the submission stage evidence, shows that the site can be viably delivered.

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<p><b>Fulford Parish Council</b></p>	<p>Since the base date of the Porter Viability Assessment, there has been massive inflation of construction costs. The CYC Corporate Director of Places quoted in 25/02/22 press report cited spiralling inflation risks for CYC building projects with some materials costs rising by more than 20 per cent. In this light, and the predictions that nationally house prices falls, the conclusions of the CYC Viability Assessments should be revisited before the end of the Examination process.</p>	<p>CYC's approach to viability testing is set out in HS/P2/M6/IR/1b(i) and the previous evidence highlighted therein – which in turn is aligned with current National Planning Practice Guidance (and that at the time of submission). The news report referenced is not part of the evidence base for the Local Plan. Build costs, as shown in the BCIS, do fluctuate on a monthly basis and indeed the costs now are higher than when the viability study was undertaken. It is important to note that as well as build cost rises, houses price values will be changing, and recently have been rising rapidly, as reported by the ONS index reports for York showing house price increases of 11% in the 12 months to May 2022, including by 2.6% in the previous three months. For the same reason as with building costs, CYC has not updated the viability work to account for these increases because it would be impractical to re-run the Local Plan appraisals on a monthly basis.</p>
<p><b>York Labour Party</b></p> <p><b>York Environment Forum</b></p>	<p>Without the up-to-date analyses of the projected all mode transport impacts of both the proposed developments it is unknown whether the proposed measures are effective in avoiding the current projections in the 2019 Transport Topic paper and the completely unacceptable 65% increase in weekday peak hour traffic delays.</p>	<p>AS indicated in EX/CYC/79 paragraph 23 initial indications are that adverse network impacts are less than originally forecast and within the context of CYC making faster progress than anticipated in delivering/ securing funding for sustainable travel mode projects. It is also to be emphasised (as explained a number of times during Phase 2) that the “65% increase in traffic delays” is an increase only in the amount of time traffic spends queuing. As such, the statistic does not indicate that a 10 minute journey in 2016 would take 16.5 minutes in 2033, but that a 10 minute journey in which 2 minutes is spent in traffic queues in 2016 would become an 11.3 minute journey in which 3.3 minutes are spent queuing. CYC's position is that this change to journey times, within the context of the Local Plan, is acceptable, especially given the mitigation package being developed for sustainable modes, which is not included within this modelled assessment.</p>
<p><b>York Labour Party</b></p> <p><b>York Environment Forum</b></p>	<p>No details of the associated impacts on air quality and carbon emissions against the Climate Act and Carbon budgets for the Local Plan period are supplied. These analyses will likely lead to a need for spatial distribution and allocations to be reviewed, additional transport measures included in an IDP. These issues can only satisfactorily be answered and concluded in phase 4 given the dates CYC has indicated for these two sets of transport analyses to be produced, and assuming compliance with the DfT's 2015</p>	<p>The IDP is necessarily concerned with delivering the infrastructure and associated mitigation for development identified in the Local Plan. While it considers how this relates to the wider network/ existing capacity. There are a range of other projects and interventions concerned with existing development and which are continuing in parallel with the Local Plan. This was explained during Phase 2. EX/CYC/79 outlines a range wider intervention being pursued in tandem with work on the Local Plan.</p>

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	guidance. There also needs to be a revised sustainability appraisal in parallel that addresses the serious shortcomings with the current SA version in parallel to allow a robust version of the plan to be adopted.	
<b>York Labour Party and York Environment Forum</b>	There is uncertainty regarding a possible grade separated public transport link across the A1237 to the ST14 which is referred to in table 1 but not Appendix 1.	A broad cost estimate for the access road and junction is included in Appendix 1 in 2.09a. The Plan policy provides for grade separation to be considered in viability and feasibility terms in the context of any future planning application.
<b>York Labour Party and York Environment Forum</b>	Table 1 refers to an overbridge and the previously suggested walking and cycling subway made large enough for single decker buses might be more practicable and less visually intrusive solution here given adjacent green belt. This would allow the most direct run on bus link from the key employment / retail / leisure facilities at Clifton Moor. Similarly, the previously proposed public transport link across the A64 to the ST15 development isn't listed in Table 1 or Appendix 1 but is mentioned in para 25 third bullet point.	The costed element in EX/CYC/79 are based on a high level technical assessment based on feasible / deliverable response. Feasibility as well as viability must be considered. Indicative costs for sustainable transport measures are clearly included in Appendix 1 of EX/CYC/79 (for example, 2.10h and 2.10g). As noted in EX/CYC/79 paragraph 27, a further ST15 Sustainable Transport Study is in progress and is considering options for walk/ cycle links between ST15 and existing built-up area In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes.
<b>York Labour Party and York Environment Forum</b>	The dedicated bus route as key to delivering the fast high quality reliable public transport link to site ST15, avoiding congested all traffic routes. This is essential reduce car use and additional traffic impacts and delays on the already overloaded Hull Road and Fulford Road corridors. This will also be particularly important in the early phases of site development when developing the bus habit will be crucial to high longer term high bus patronage, low car usage.	Noted and as noted in EX/CYC/79 paragraph 27, a further ST15 Sustainable Transport Study is in progress and is considering options for walk/ cycle links between ST15 and existing built-up area In addition, Policy T7 and T8 provide a framework for minimising car journeys and promoting a shift to more sustainable transport modes. Bus priorities for Hull Road and Fulford Road (or wherever else required to support effective bus services to/ from ST15) are being developed as part of York's Bus Service Improvement Programme.
<b>York Labour Party and York Environment Forum</b>	The omission of these key public transport links included in the current 2005 development control version of the plan that we referred to in our original transport submission, in our phase 2 written submissions on matters 1 & 4 underlines our concerns at CYC's failure to properly evaluate what's required to make new communities sustainable, minimum development size to deliver commercially viable 7 day a week high quality public transport services. CYC should increase the size of ST14 & 15 site sizes to	The evidence published supports the submitted Local Plan policy – and it is that which is being examined. In relation to the scale of sites, Section 3 of the Plan articulates the spatial strategy and justification for this. This is further summarised in EX/CYC/79 and paragraphs 6 to 9. Increasing the scale of the site is inconsistent with the balance Plan has been extensively researched and refined over a period of several years. The Plan adopts a balanced approach to accommodating growth (and reflected in the Sustainability Appraisal 2018). Even aside the non transport-led shapers



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	<p>ensure we can both deliver the appropriate capital investments and high-quality public transport /dedicated bus links. Enlargement of the ST15 site could also help deliver the size required to ensure the on-site provision of a secondary school which Table 1 currently only lists as a possibility, plus some local shopping and employment to make it more sustainable.</p>	<p>outlined in Section 3 of the Plan and SS1 which inform the location and scale of allocation, an enlarged site is not the appropriate response in transport terms. A larger site allocation might be better able to support bus services but would have a larger adverse impact on traffic flows in its vicinity because it would generate a greater absolute number of trips on and off ST15, even if a greater proportion of the development's trips were on sustainable modes.</p>
<p><b>York Labour Party and York Environment Forum</b></p>	<p>There doesn't appear to be any allocation in Appendix 1 for measures at the A64 Fulford Road intersection where capacity issues have been flagged in the recent CoYC statement of common understanding with National Highways. We want to ensure that there are adequate bus priorities through this junction to ensure the important A19 Selby Arriva and Naburn Park services can run through it without delays (and then into town) given the major negative impacts congestion on Fulford Road already has on the existing bus services.</p>	<p>As stated in Policy SS13, a segregated route over the A64 will be provided to ST15. Inevitably the development will increase traffic volumes on Fulford Road, but modelling work is ongoing to consider options to mitigate this impact. High level costs associated with this mitigation as it relates to ST15 are included in Appendix 1 and have been tested in viability evidence. Measures to improve bus priorities on Fulford Road are being developed through York's BSIP Programme.</p>
<p><b>York Labour Party and York Environment Forum</b></p>	<p>York Central will be subject to significant peak hour delays getting through the Leeman Road (Marble Arch) tunnel adversely affecting bus reliability and use. Additional through traffic will also negatively impact the Lendal gyratory on the Inner Ring Road (serving the majority of bus routes) negatively impacting service journey times and reliability. This previous plan commitment to not providing any through route to the city centre for general traffic means should be revisited.</p>	<p>The IDP is focused on concerns with delivering the infrastructure and associated mitigation for development identified in the Local Plan. While it considers how this relates to the wider network/ existing capacity, it is focused on how new development can be accommodated rather than tackling pre-existing deficiencies. As explained during Phase 2, there are a range of other projects and interventions concerned with existing development and which are continuing in parallel with the Local Plan. EX/CYC/79 outlines a range wider intervention being pursued in tandem with work on the Local Plan. The ST5 S106 has been determined, the wider measures as suggested would be expressed in the Local Transport Plan, not Local Plan.</p>
<p><b>York Labour Party</b>  <b>York Environment Forum</b></p>	<p>CYC needs be asked to demonstrate what the predicted impacts of the increased traffic from local plan development will be on bus journey times and reliability, not just cars. This is not as simple as simply looking at peak hour general journey times as traffic and congestion spread beyond just the peak hour over this has had a multiplier effect on disruption to bus services giving rise to negative perceptions of bus travel and inability to attract car drivers to switch.</p>	<p>CYC does aspire to higher bus uses and this is formalised in policy by targets to modal shift (EX/CYC/79, para 27). The recent improvements achieved by CYC in providing improved bus services was explained during Phase 2. York's Bus Service Improvement Plan (BSIP) contains aspirations to enhance the bus service generally and provide Bus Rapid Transit services to sites ST14 and ST15 (the largest site) to deliver the 15% mode share to bus identified in the site-specific policies for these sites. The new VISUM</p>

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	Increase in traffic and delay could easily undermine CYC aspirations for higher bus usage.	model includes an inter-peak period which will be used to derive the bus priority measures in the BSIP programme.
<p><b>York Labour Party</b></p> <p><b>York Environment Forum</b></p>	Active travel provision on proposed allocations is inadequate, particularly for upgrading the existing cycling network against a decline in cycling since 2014. CYC acknowledged during the phase 2 matter 4 hearing the existing network was sub-standard and needs significant investment to rectify and have really wide appeal. Until comprehensive and complete LTN1/20 compliant routes are delivered, we will not see the scale of modal shift that the Plan requires nor meet the Plan objectives to not increase congestion. Providing high quality cycling (and walking) links to new development sites will not work if they feed into an unacceptable existing network. See Phase 2 written submission related to the Tadcaster road scheme and costs for delivering LTN1/20 compliant schemes.	As noted in EX/CYC/79 paragraph 28, CYC are delivering several schemes to improve walking and cycling facilities across the City. Over time these will continue to reduce car trips on congested radial corridors. This includes new cycle lanes through York Central, around the Railway Station and on Tadcaster Road, Shipton Road, Acomb Road and the A1237 Ouse Bridge. CYC is developing a Local Cycling and Walking Infrastructure Plan (reference to which in supporting Plan implication will be included in the Plan) as was explained during Phase 2 York's new Local Transport Plan will be used to win funding to implement the improvements sought to active mode infrastructure.
<p><b>York Labour Party</b></p> <p><b>York Environment Forum</b></p>	Figures 5 & 6 only shows the off-road cycling network, but a cycling network needs to link residential areas to all key destinations and needs to include radial cross-linking routes – there are none shown to several key employment, retail and leisure sites (e.g. Monks Cross, Poppleton and White Rose Business parks, etc. shown) The proposed key cycling network is inadequate and the large scale plans in the 2005 development control version of the Plan should be incorporated	Figures 5 and 6 show only the core network – many links are omitted for clarity – and it therefore understates York's provision. However, the maps show the principal connections, and cycle and walking provision will connect in with this – including radial routes (and in many cases already do so). As noted in EX/CYC/79 paragraph 28, urban fringe strategic sites will be linked into existing walk and cycle networks. ST14 and ST15 will have dedicated walk/cycle paths, as required through policies SS12 and SS13. A study is in progress to determine how best to provide cycle routes to ST15 (and connections within it).
<p><b>York Labour Party</b></p>	We note that the Utilities section in Appendix 1 doesn't include any line for comms services in support of Policy C1. We also question whether Policy C1 is up to date itself given the time since submission, the fast moving digital revolution and the Government's current <a href="#">Project Gigabit approach</a> .	The policy framework is provided by C1 as referenced in EX/CYC/79 Appendix 2 and as highlighted in the note CYC engaging with utilities providers on an ongoing basis. CYC agree that future updates should be included where relevant in updates to the IDP
<p><b>York Labour Party</b></p> <p><b>York Environment Forum</b></p>	References to new schools/ school extensions being within reasonable distance of developments needs defining relative to pupil ages and walk distances so robust sustainable age-appropriate solution in travel terms and development size can be delivered. Para 40 suggests that the Plan could provide places in schools beyond likely walking and cycling distance from some developments which would be unacceptable at pre-secondary level and highly undesirable even at secondary. See our earlier point	On site provision of secondary school is a potential requirement for ST15, subject to child yields (and therefore provision is linked related to the level of trip generation). On site provision of primary schools is clearly proposed in the policy requirements for ST16 and reflected in CYC infrastructure evidence.

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	about ST15 being big enough to be able to deliver a local secondary school to avoid this problem.	
<b>York Labour Party/ York Environment Forum</b>	Regarding paragraph 38, it is vital there is local early years provision, for all new sites and certainly for sites ST14 & 15. This should be specifically covered in Table 1 and the Appendix 1 allocations. SEND provision is vital too.	Noted, these are not specified as early years provision may be delivered in a range of settings, including nurseries in schools and other community setting. However, the costs for this have been tested in CYC's viability evidence. A line will be included in future IDP update to reflect this – but the detail or provision will be identified in detail in the context of the planning applications including for ST14 and ST15.
<b>York Labour Party/ York Environment Forum</b>	Under next steps, para 42, we welcome CYC's commitment to at least an annual reporting programme. This should be formally incorporated in the Plan.	Noted – CYC agrees, as set out in 6.2.6 of our Phase 2 Matter 6 Hearing Statement the intention and commitment for the IDP to be reviewed regularly and updated to support Plan implementation should be included in Section 15 of the Plan.
<b>Civic Trust</b>	EX/CYC/79 was submitted on 18 May, eleven weeks after the due date for submissions for Phase 2. CYC failed to alert Matter 6 participants. We are grateful to the Inspectors for allowing further written responses and urge instructions to avoid any recurrence.	Noted.
<b>Civic Trust</b>	EX/CYC/79 does not appear to offer much that is new in respect to transport impacts/ modal shift. No evidence is offered that any of the schemes included will mitigate the impacts of new development or reduce demand on the road network.	The comment is unclear. The transport intervention identified are intended to mitigate the impacts of development and are appropriately defined for local plan making stage. A detailed strategy for achieving improvements to transport in York, including mode shift away from car will be articulated in York's Local Transport Plan.
<b>Civic Trust</b>	EX/CYC/79 provides more detail than EX/CYC/70a on the measures to support strategic sites ST4, 5, 7, 8, 9, 14, 15, 17 and 37.	Yes, it details rather than changes the intended approach and future update will expand on that level of detail where possible.
<b>Civic Trust</b>	CYC said at Phase 2 hearings that highways improvements will support bus and active travel access. While true, it is disingenuous to suggest that they will be major beneficiaries. 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 this such as the segregated route [for buses] over the A64 to ST15". But 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 comments in the hearing statement and during Phase 2 were highlighting the fact that the highways improvement will facilitate vehicle movement including buses and cycles. The segregated bus route over the A64 is being considered through the Sustainable Transport study for ST15 and development of it forms part of York's BSIP.

Representee	Summary (see original submission highlighted above for full text)	CYC Response
<b>Civic Trust</b>	<p>We welcome the commitment to additional funding for bus services, park and ride and demand management. A much larger sum than the £4.9m allocated will be needed if CYC is to achieve its planned 33% growth in active travel by 2030. Cycling levels in York have declined significantly since 2014 and CYC 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. CYC has been unsuccessful in attracting significant further allocations in the latest funding round.</p>	<p>The figure of £4.9m relates purely to measures which are already in CYC's capital programme. Although future funding is never assured, it would be reasonable to conclude there will be further allocations towards developing active mode transport infrastructure in the future, through CYC's own capital fund, bids and grants from regional and central government and S106 agreements with developers. As was mentioned during Phase 2, CYC does not share YCT's view that the last 8 years have seen active travel failure in York, given that the period has included delivery of the Scarborough Bridge project and Knapton – Rufforth cycle path, as well as the city hosting the Tour de France in 2014. Cycling levels in the last pre-pandemic year, 2019, were 10% higher than in 2011, whilst the level in 2014 which YCT choose as a baseline was untypically high because the Tour de France visited York that year and it would be reasonable to see a reduction from that level in subsequent years.</p>
<b>Civic Trust</b>	<p>None of CYC's documents provides analysis to demonstrate that any of the projects listed achieves objectives to increase sustainable travel reduce the need to travel, or that they are the most cost-effective ways of doing so. CYC must 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. This analysis must demonstrate that the balance of expenditure between highways improvements, bus service enhancements and provision for active travel is effective.</p>	<p>This information is inherent in policies T1 to T9 of the Local Plan and the analysis is presented in the Transport Topic Paper. This work is being updated in the Local Transport Strategy which will be presented to Phase 4 of the hearings as indicated in Phase 2 hearings.</p>
<b>York Bus Forum</b>	<p>High quality public transport is essential for all strategic sites but is not specified in EX/CYC/70 and it is unclear how they will be delivered. EX/CYC/79 (Appendix 1) provided an update to the schemes list, but (ref 2.40 page 21) contains the same wording as before.</p>	<p>The update clarifies – and updates where necessary – rather than alters the evidence submitted in May 2018 including the IDP, 2018 (SD128). EX/CYC/79 identifies the need for bus service enhancement (and Appendix 1 also identifies indicative costs associated with strategic developments.</p>

Representee	Summary (see original submission highlighted above for full text)	CYC Response
<p><b>York Bus Forum</b></p>	<p>A wider series of bus priority and bus infrastructure measures to offset the traffic and congestion growth and provide a high-quality Citywide bus network is required if a significant mode shift to public transport is to be achieved. The bus priority measures listed in the current development control 2005 Local Plan not yet delivered should be included in this Plan. There is no evidence that the Plan will deliver the requirements for high quality public transport to support the level of growth proposed nor analysis of what is needed to mitigate the predicted 35 or 65% increase in congestion. This should have been done in line with the DfT 2015 guidance on the Transport Evidence Base for Local Plans. The only indication of the cost of these measures (which could be significant if it involves fast, segregated bus routes) is for an indicative cost totalling £3.5m for “bus enhancement” to serve sites ST7, ST14 and ST 15. There is no committed sum for these enhancements, which all rely solely on developer contributions. The size of the CYC’s Bus Service Improvement Plan suggests what is required will be at far higher cost, and it doesn’t clearly cover all the previous 2005 Local Plan schemes we refer to earlier.</p>	<p>CYC’s evidence clearly identifies, including in EC/CYC/79 solutions to support a pattern of development that and ‘where reasonable to do so’, facilitates the use of sustainable modes of transport as set out in the <a href="#">2015 DfT</a> guidance referenced. The contributions identified are those associated with mitigating the impact of the specific strategic developments highlighted through developer contributions and not dealing with unrelated demand which would be contrary to the use of developer contributions set out in the Community Infrastructure Levy Regulations 2010 as amended. CYC BSIP and recent successful funding is part of the wider interventions (beyond the local plan) to promoting modal shift, see EX/CYC/79, paragraph 29.</p>
<p><b>York Bus Forum</b></p>	<p>The Sustainability Appraisal is unsound because it gives the same score for transport impact to a development site irrespective of the number of dwelling units. This gives no basis for assessing the impacts on different sites of congestion, on levels of travel or on modal choice. It fails to support the site allocations or to demonstrate that they are viable and deliverable. It is also unsound because it fails to address the cumulative impacts of the proposed new development and their mitigation.</p>	<p>The sustainability appraisal is focused on identifying significant effects and has been undertaken in line with relevant legislation and best practice. An assessment of infrastructure implications, including transport National Planning Practice Guidance Reference ID: 11-009-20140306). It is also a matter of judgment and view may differ. A more nuanced approach to infrastructure than implied in this comment is reflected in the Sustainability Appraisal as outlined in with in EX/CYC/84, paragraph 31 to 32). EX/CYC/84 also explains that the sustainability is not a project specific highly detailed EIA, and the assessment is at a proportionate level appropriate to plan policies and allocation. Cumulative development impacts or new development are included in the Sustainability Appraisal, see CD008 where the cumulative assessment matrix is presented in Table 6.4 and summarised in Section 6.7.</p>