



# York Civic Trust

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## **Inquiry into York's draft Local Plan: Phase 3**

### **Written Statement in connection with Matter 4 – Strategic Sites**

**4<sup>th</sup> July 2022**

This statement in relation to Matter 4 is submitted by York Civic Trust. The Civic Trust is a membership organisation representing some 1300 individuals. Our vision is 'promoting heritage, shaping tomorrow'. Our Mission is to: protect and contemporise York's unique heritage; champion our environment and its sustainability; encourage the city's economic development in line with its character and engage with all sectors of the community.

This statement has been prepared by Andrew Morrison, Chief Executive of York Civic Trust along with Professor Tony May OBE FREng CEng FICE and colleagues.

York Civic Trust is committed to helping to secure a Local Plan, based broadly on the current draft. We are concerned, however, that there are weaknesses in the way in which the Plan has been formulated, and aspects of its resulting content which render it unsound. We have endeavoured throughout the process to work with City of York Council to secure improvements which overcome these deficiencies. In autumn 2021 we offered to prepare a Statement of Common Ground with the Council, so that our proposals for enhancement could be seen in the context of the overall approach. It did not prove possible to agree on one for Phase 2 of the Inquiry. However, one is now in final draft, and we expect it to be signed and submitted in time for consideration in Phase 3. We focus here on the remaining areas which we consider need to be resolved.

The Inspectors ask us to:

- Explain which part of the Plan is unsound;
- Explain why it is unsound, having regard to the Framework;
- Explain how the plan can be made sound; and
- Explain the precise/change/wording that is being sought.

We have endeavoured to do this, though where we have concerns over the process of plan making, we are clearly unable to answer the last of these.

*Patron* H.R.H The Duchess of Kent

*President* Andrew Scott CBE CEng FMA • *Chair* Stephen Lusty • *Chief Executive and Company Secretary* Andrew Morrison

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## **Matter 4**

### **General Points:**

We have focused in our response on the larger Strategic Sites, where the scale and style of development are most likely to have adverse effects on the City if inappropriately planned. We thus do not offer answers to questions 4.2-4.6, 4.9-4.12 or 4.15-4.22.

York Civic Trust's answers to question 4.1 draw on the detailed responses which we have given to a series of consultations on York Central. Our answers to questions 4.1, 4.7, 4.8, 4.13 and 4.14 set out below are put forward within the context our general points made in Phase 2 in our answers to questions 4.2 and 4.3 (Policy SS1) in which we stated that the council's strategy of locating greenfield development some distance from the edges of built-up areas and across several locations is at the expense of economic and social viability and sustainability. This is counter to NPPF12 and a number of the development principles set out in policies SS9 and SS12. The draft Local Plan provides the opportunity to pursue the best possible scale and distribution of development.

Within the last week the Council has submitted its reports CYC/87 and CYC/87a, which present updated estimates of impacts of all developments on the road network. We have done our best to assimilate them in the limited time available to us and present a summary of our interpretation in an annex to this submission. The reports provide an update to the 2019 Transport Topic Paper, and hence have potential implications for many of the submissions which we made in Phase 2. Unfortunately, the data provided does not permit a direct comparison with the predictions in the Transport Topic Paper. However, it does show that, whether the planned increase in development is assigned as proposed in the Local Plan, or distributed consistently across the city, car journeys are predicted to rise by around 15% by 2033, and public transport journeys to fall by around 4%. These trends run counter to the targets set in the Council's recently published draft Climate Change Strategy, which envisage a 25% reduction in person travel, a 3% reduction in road use and a 25% increase in bus use by 2030. They also suggest that congestion will increase, and hence demonstrate a failure to satisfy Para 3.12 of the Local Plan which says that new development should not lead to increased congestion, should facilitate the use of sustainable transport, and should minimise the future growth of traffic. It is clear to us, therefore, that reports CYC/87 and CYC/87a reinforce the need for the Council to identify and assess ways of mitigating such impacts of development. We welcome the Council's commitment to doing so, and to reporting in good time for the consideration of these results in Phase 4 of the Inquiry.

### **Question 4.1 Is the allocation and associated policy SS4 relating to ST5 soundly based?**

York Civic Trust has long supported the redevelopment of the York Central site, believing it to be a once-in-a-century opportunity, not only to develop the site itself but to provide York with a new quarter with transformational potential for the city.

York Civic Trust considers that York Central (ST5) offers many benefits to the city. The Civic Trust welcomes the decision, in principle, to provide 100,000 sqm of high-quality office space, and the provision of 1700 new homes (up to a maximum of 2500) will assist in

alleviating the city's housing shortage. York Civic Trust supports the vision for York Central as set out in Para 3.24 and acknowledges that account will be taken of the special architectural or historic interest of the neighbouring conservation areas.

York Civic Trust, however, considers that development principles IX, X, XII, XIII and XIV as set out in policy SS4 are contradicted by the approved Outline Planning Permission (18/01884/OUTM) and Reserved Matter Application Phase 1 Infrastructure (20/00710/REMM) in a number of areas and that the allocation for ST5 cannot therefore be considered sound.

**IX. Ensure provision of social infrastructure which meets the needs of York Central and, where viable, the wider city communities including sports, leisure, health, primary and nursery education, community facilities and open space**

The Outline Planning Application for York Central (18/01884/OUTM) contains little provision for social and communal infrastructure. There is an absence of health and education facilities for the site. The development's own Environment Statement (Vol. 4 Non-Technical Summary, 6.14) states that the development 'will put further demands on social infrastructure, including health and social care facilities, unless more is provided within or close to the Site' and '[p]otentially moderate adverse effects could occur upon education provision' (Vol.4 Non-Technical Summary, 6.8), with explicit exclusion of schools as part of the proposed floor space in York Central by category use (Development Specification, Revision A, Table 2.1). The lack of such provision and therefore the increased pressure placed upon the existing infrastructure is contrary to Development Principle IX.

**X. Maximise the integration, connections and accessibility to/from the site including inter-modal connectivity improvements at York Railway Station**

The Outline Planning Permission for York Central (18/01884/OUTM) includes two new multi-storey car parks providing 1066 car park spaces for people wishing to drive into the city to access the station or visit the commercial area. By encouraging people to make car journeys into the city centre this development is contrary to Development Principles X, XIII, and XIV. We recommend that a substantial reduction in station parking should be sought, and those accessing the station redirected to park and ride sites with enhanced park and ride services provided to York Railway Station.

**XII Demonstrate that all transport issues have been addressed, in consultation with the Council and Highways England as necessary, to ensure as many trips as possible are taken by sustainable travel modes and promote and facilitate modal shift from the car.**

York Central Partnership's consultants predicted in 2019 that the proposal to allow all traffic to use the Access Road would create a flow through Museum Square of 1045 veh/h in peak hours, which is roughly equivalent to that on Gillygate, which is one of the most congested and polluted roads in York City Centre. The proposal to attract through traffic to use this new link is inconsistent with Policy T1, which requires new developments to demonstrate that (vi) "New roads or accesses through the development restrict access for, or otherwise discourage general motor traffic." Such levels of traffic will impose severance within the residential community and between the NRM and the Station.

While we welcome the commitment to provide a high-quality cycle route through Leeman Road Tunnel, the consultants' analysis indicates that alternate one-way operation for all traffic on the other lane would impose delays of up to three minutes on southbound buses in both morning and evening peaks. Both flowing and standing traffic would significantly detract from the new area of high-quality public realm proposed for Museum Square.

The resultant congestion caused by this through traffic within ST5 and on the York Inner Ring Road could readily be addressed by the insertion of a bus gate at the Leeman Road Tunnel so that traffic through the tunnel is limited to buses, taxis, and appropriate local traffic. York Civic Trust, York Central Partnership and City of York Council formed an agreement in July 2020 to work together to consider all options for traffic passing through the Leeman Road tunnel. Unfortunately to date the Council have not agreed to commence this analysis, despite York Civic Trust's frequent requests to do so.

As noted earlier, documents CYC/87 and 87a present the results of the Council's assessment of the impacts of the Local Plan developments on the highway network, using the Council's new strategic model. We provide a fuller assessment of these documents in the annex and outline the implications for ST5 here. The tests conducted by the Council's consultants assess the combined impact of all developments proposed in the Local Plan. It is not therefore possible to isolate the impacts of the development of York Central. Moreover, base data for 2019 are not provided for the Leeman Road route through the site, so that it is not possible to assess any changes in travel times on that route because of the development.

Results are available for travel times on two routes which will be principally influenced by the York Central development. The first is Water End, immediately to the north of the site, where travel times are predicted to increase between 2019 and 2033, in the peak direction, by 55% in the morning peak and 68% in the evening peak. The second is the Inner Ring Road, which includes sections closer to and further from the site. Here peak period travel times are predicted to rise by between 11% and 19% between 2019 and 2033. It is clear, therefore, that the York Central development, without further mitigation measures, will be associated with an increase in congestion. We encourage the Inspectors to seek evidence on the potential for mitigating this impact in time for consideration at Phase 4 of the Inquiry.

York Civic Trust welcomes the ambition of Para. 3.27 *'Sustainable travel modes taking full advantage of the site's location will need to be maximised in order to limit impacts on the wider road network, congestion and air quality. Opportunities will be developed around pedestrian and cycle linkages, Park and Ride and bus service improvements.'* However, it notes that, under the York Central Partnership's proposal, the residential community in York Central would only be served by two or three buses per hour in each direction. This is incompatible with Policy T1. We argue that the residential area should be served by at least six buses per hour in each direction. This could easily be achieved by rerouting Park and Ride services (#2, 59) through York Central in both directions and providing stopping points within the residential area.

### **XIII Minimise the environmental impact of vehicular trips**

York Civic Trust strongly believes that the environmental assessment for York Central is based on unsound information and analysis and should be reassessed to examine the impact of York Central on completion in 2033.

The approved Outline Planning Permission sets a standard of one parking space per 175 sq m which results in a requirement of 500 parking spaces for commercial office users. This is unduly generous by comparison with other developments. York Civic Trust suggests that at the most one space per 350 sq metres is more in keeping with Development Principle XIII in addition to reducing parking at York Railway Station and encouraging a greater use of Park and Ride services to access the Station.

### **XIV Ensure sustainability principles are embedded at all stages of the development.**

York Civic Trust's Sustainable Communities Report (Stevens 2021) and review of Derwenthorpe (Stevens 2022) concluded that sustainable communities should be designed to prevent through traffic. The current proposals for the Access Road clearly contravene this and Policy T1. We would like to see the need to restrict or remove through traffic explicitly incorporated into the principles in Policy SS4.

#### **Question 4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?**

Strategic site ST7 is one of three free-standing development sites on which we expressed our concern, in the Phase 2 hearings, that they are too small to support the services needed to establish an effective community or to result in patterns of sustainable travel and activity.

Policy SS9 does not create the grounds for ST7 to be a sustainable community due to its size (845 dwellings on 34 hectares with a gross density of 25 dph); its separation from the existing urban fabric; its lack of a connection to the development of Derwenthorpe; and the resulting lack of any advantageous direct public transport links.

When compared with the initial proposal (2013 Proposal Map) ST7 has been reduced in size from 1800 dwellings and has become detached from the surrounding urban area so that it no longer provides the basis for the development of a sustainable community. The reduction to 845 dwellings, or around 2000 inhabitants, would place it well below the lower threshold for a garden village (DEFRA, 2018).

SS9 Para iv requires the delivery of 'education and community provision early in the scheme's phasing, in order to allow the establishment of a new sustainable community. A new primary facility and secondary provision (potentially in combination with Site ST8 – North of Monks Cross) may be required to serve the development as there is limited capacity available in existing schools.' In our view such provision cannot be accommodated within the existing allocation of ST7 and maintain the 'garden village' character due to the size of the development. This would lead to any new facility being provided away from the development, increasing the number of car journeys to and from the development.

SS9 Para v, which concerns impacts on the highways network, requires that the 'impacts of the site individually and cumulatively with sites ST8, ST9, ST14 and ST15 should be

addressed'. As noted earlier, documents CYC/87 and 87a present the results of the Council's assessment of the impacts of the Local Plan developments on the highway network, using the Council's new strategic model. We provide a fuller assessment of these documents in the annex, and outline the implications for ST7 here. The tests conducted by the Council's consultants assess the combined impact of all developments proposed in the Local Plan. It is not therefore possible to isolate the impacts of the development of ST7. The only data in the results of relevance is that on travel times on the Hull Road, which will be influenced by other proposed developments. Peak period travel times here are predicted to rise by between 13% and 20% between 2019 and 2033. This suggests that mitigation measures will be needed throughout the corridor, including for ST7. We await the Council's assessment of such measures.

SS9 Para vii requires the delivery of 'high quality, frequent and accessible public transport services through the whole site to provide attractive links to York City Centre. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport. Public transport links through the adjacent urban area will be sought, as well as public transport upgrades to either the Derwent Valley Light Rail Sustrans Route, or bus priority measures on Hull Road and/or Stockton Lane, subject to feasibility and viability.' Para vi makes a passing, and inexplicable, reference to 'a small proportion of public transport traffic potentially served off Bad Bargain Lane'.

At present the area is served by the First #6 Bus Route which already takes a long and sinuous route to and from the city centre. First #11 Bus Route provides some access to Bad Bargain Lane but does not reach the detached development site of ST7. The adjacent settlement of Derwenthorpe is only served by the Connexions #25 route, which operates hourly and only during the working day. This existing provision does not provide the attractive links to the City Centre required by this paragraph. Our recent review of Derwenthorpe: Developing Sustainable Communities – Case Study 1: Derwenthorpe, John Stevens, May 2022) highlighted sustainable transport 'as the weakest aspect of the development as the current public transport is infrequent with limited operating hours and no service on a Sunday and as such is of little use as an alternative to the car'.

The proposed bus link to either Stockton Lane or Hull Road would be orbital and thus not oriented towards the city centre or other major destinations. With such inadequate services, there is no possibility of achieving the target of 15% of trips by bus, as experience with Derwenthorpe already demonstrates. Moreover, a population of 2000 is well below the threshold needed to support a commercial bus service. Policy SS9 should be strengthened to include a dedicated direct public transport link through the nearby Derwenthorpe sustainable development. This would improve the provision both for ST7 and within Derwenthorpe and would expand the service's catchment, thus making the service more commercially viable.

York Civic Trust believes that the allocation for ST7 as outlined in the 2013 proposals map is more appropriate to create a sustainable community than is the smaller allocation included in the 2018 draft plan. The 2013 proposal would directly connect the development to the

existing Derwenthorpe and allow for the possibility of connecting and enhancing existing public transport and other local services and reducing car journeys.

**Question 4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?**

York Civic Trust welcomes the new open space protecting the setting of the Millennium Way in the form of a 50m green buffer and the new open space to the north of ST7 as set out in Principle IX. As we have stated in our answer to Question 4.7, the retention of green belt between ST7 and Metcalfe Lane detaches the development from neighbouring urban development with its community, and social facilities. York Civic Trust believes that this part of the green belt could be removed and given over to development to create a larger and hence more sustainable community.

York Civic Trust believes it would be more beneficial to creating a sustainable community to remove the green belt land between ST7 and Metcalfe Lane and increase the scale of the ST7 development in line with the 2013 Proposals Map.

**Question 4.13 Is the allocation and associated Policy SS12 relating to ST14 soundly based?**

Policy SS12 relating to Land West of Wigginton Road (ST14) sets out the development of a sustainable garden village of 1348 dwellings with approximately 1200 being delivered in the plan period. York Civic Trust has made the case in our answers to Phase 2 Questions 1.2, 1.3 and 4.2 for a minimum size of the largest developments in the Plan, to ensure that the community can support the services which it needs. Our initial recommendation was for a minimum population of 15,000 which equates to 6500 dwellings (Sustainable Communities Workshop, YCT, 2021). Evidence indicates that a population of at least 12,000 is needed to support a free-standing commercial bus service, a surgery and a secondary school.

ST14, the second largest development in the plan, falls well short of this proposed development minimum. Indeed, even when fully constructed, its population of around 3,100 would still be below the lower threshold for a garden village (DEFRA, 2018). The allocation relating to ST14 has been reduced from the initial proposal set out on 2013 proposals map. The scale of the 2013 proposal of 4000 homes is closer to York Civic Trust's recommendation and we strongly recommend that the allocation is increased to at least this level.

**Principle IV** - Policy SS12 Principle IV 'Deliver on site, accessible combined nursery and primary education facilities, which are well connected to housing by dedicated pedestrian/cycleways.' The Department of Environment's 2014 guidelines for new schools (Building Bulletin 103) recommend a minimum of 2400m<sup>2</sup> for a combined nursery/primary provision. York Civic Trust believes there is insufficient space to fully accommodate this provision alongside other requirements within the allocation.

**Principle VI** – Policy SS12 Principle VI specifies 'new all-purpose access roads to the east/south from A1237 Outer Ring Road/Wigginton Road roundabout and off the Wigginton Road/B1363'. In practice the first of these is now proposed to link to the upgraded A1237 Outer Ring Road/Clifton Moor Gate roundabout. We agree that this is a more appropriate provision, since it reduces the potential for further congestion on Wigginton Road, and

provides a direct link to Clifton Moor, which York Civic Trust wishes to see repurposed as a mixed-use high-quality development.

**Principle VII** – In considering the impact of traffic on the highway network, Principle VI requires that the ‘impacts of the site individually and cumulatively with site’s ST7, ST8, ST9, ST15 and ST35 should be addressed’. As noted earlier, documents CYC/87 and 87a present the results of the Council’s assessment of the impacts of the Local Plan developments on the highway network, using the Council’s new strategic model. We provide a fuller assessment of these documents in the annex and outline the implications for ST14 here. The tests conducted by the Council’s consultants assess the combined impact of all developments proposed in the Local Plan. It is not therefore possible to isolate the impacts of the development of ST14. The results presented include travel times on two routes adjacent to the site: the outer ring road (although this is the entire length of the A1237) and the Wigginton Road. They show minor difference in travel times on the Wigginton Road between 2019 and 2033. However, on the A1237, even with the dualling of the section east of the A19 included, travel times rise by between 20% and 22% in the morning peak over this period. For the evening peak increases are smaller, at 3% clockwise and 12% anticlockwise. The dualling of the section between the B1224 and the A19 appears to have little further impact on travel times. The dualling of this road is insufficient to counter the impacts of the new developments proposed in the Plan, and that mitigation measures will be needed. It will be essential for these to be identified and assessed in time for Phase 4 of the Inquiry.

**Principle VIII** - Policy SS12 Principle VIII specifies the delivery of ‘local capacity upgrades to the outer ring road in the vicinity of the site, to include associated infrastructure to protect public transport journey times on junction approaches. Opportunities to provide grade separated, dedicated public transport routes across the A1237 should be explored in feasibility, viability, and cost-benefit terms’. The proposals for the outer ring road upgrade are now well advanced, and subject to an imminent planning application. York Civic Trust supports this upgrade, but only on the understanding that it is used to reduce the amount of traffic within the ring road. It does, however, note that CYC/87a demonstrates that the upgrade will be insufficient to meet the unconstrained traffic generated by the new developments. The Trust is also concerned that the current proposals fail to address the requirement ‘to protect public transport journey times on junction approaches’. Moreover, no attempt has been made to conduct the promised investigation of ‘grade separated, dedicated public transport routes across the A1237’ and the opportunity will be lost once the outer ring road is upgraded. We see little point in including such commitments in the draft Local Plan if they are not acted upon.

**Principle IX** – Policy SS12 Principle IX makes a commitment to ‘Deliver high quality, frequent and accessible public transport services through the development site, which provide links to other local rural communities where feasible, as well as to main employment centres’ and again envisages that ‘such measures will enable upwards of 15% of trips to be undertaken using public transport’. We understand that the only current proposal is to extend the Route #6 to service the development, and to make use of the Route #40, which offers an hourly service on Wigginton Road. While Route #6 serves Clifton Moor and the



Hospital, it takes an extremely tortuous route to the city centre. It and the Route #40 service bear no resemblance to the 'high quality, frequent' service which is promised in the Plan. They offer no realistic potential of achieving anything close to the 15% mode share envisaged. York Civic Trust's preferred solution would be to provide a new park and ride facility immediately north-west of the A1237/Wigginton Road junction, with high frequency electric buses operating on a dedicated route into the new development. This would also provide a hub for other communities in the vicinity, offer a more appropriate starting point for the Hospital's recently introduced park and ride service, and alleviate pressure from the existing Rawcliffe park and ride facility. We recommend that this Policy be modified to incorporate such provision.

**Principle X** – York Civic Trust welcomes the provision of high quality, safe, direct and accessible pedestrian and cycle links to community, retail, and employment facilities immediately to the South. However, to be at their most effective in delivering the maximum take-up of more active forms of transport the cycling routes to the city centre, which are indirect, in a poor state of repair and incomplete, must be upgraded by the Council otherwise the development ambitions will fail.

#### **Question 4.14 Are the Green Belt boundaries of the ST14 site reasonably derived?**

York Civic Trust welcome the commitment to maintain the landscape buffers around the site to maintain the setting of the village of Skelton. However, we believe that the green belt between ST14 and the village is overly generous and that the green belt to the south which separates the development from the A1237 would be better utilised as development land to create a larger sustainable settlement as set out in the Proposals map of 2013, as well as incorporating our proposed park and ride site.

#### **Annex: our interpretation of documents CYC87 and CYC87a**

Documents CYC/87 and 87a present the results of the Council's assessment of the impacts of the Local Plan developments on the highway network, using the Council's new strategic model. These tests were commissioned in October 2021, but the results have only been received within the last week before the deadline for making this submission. We have done our best to assimilate these documents in the limited time available. We offer a brief summary here, which we hope will be of assistance to the Inspectors.

The scenarios tested Two sets of scenarios have been tested for three-time horizons: 2025, 2033 and 2040. The first set assumes that all developments proposed by those dates will be in place. The second set, tested only for 2025 and 2033, represents a "do-minimum" in which the same level of new development takes place, but distributed across the city. All assume that the northern section of the outer ring road between the A19 and A64 has been dualled, together with some specific highway interventions within the city. There are in addition, for 2040, three alternative versions of the ST15 development, and one which includes dualling of the section of the outer ring road between the B1224 and the A19. No attempt has been made to assess the individual impacts of specific strategic sites.

The assumptions made The forecasts use Department for Transport procedures for estimating changes in journey making by residents and businesses. Taken together with the increase in activity resulting from new development, this leads to an increase of around 15% in car travel and a reduction of around 4% in public transport use between 2019 and 2033. As noted earlier, these run counter to the Council's own targets for 2030 in its Climate Change Strategy. It is clear, therefore, that mitigation measures are needed, but none have yet been tested. We expect to see these in time for Phase 4 of the Inquiry.

The analysis in CYC/87 This document reviews trends in traffic flows on several parts of the network and uses these to suggest that the predictions based on Department for Transport procedures are 'a very conservative approach which is likely to overstate the traffic impacts of growth in York'. This assessment should, we suggest, be treated with caution. The recently released data for the 2021 census indicates that population in York has only risen by 2.4% in the last decade, which calls into question the data presented on page 9 of CYC/87. Moreover, the principal growth has been in those over 65 who travel less. Any growth in traffic will thus have arisen from a greater propensity to travel among the existing population. This assessment is reinforced by the results in Table 2, which indicate that, on the one section of the outer ring road to be improved (the A59 roundabout) traffic levels increased by 23% in seven years. On balance we would suggest that the predictions for car traffic growth in CYC/87a should be treated as a realistic estimate of the increase in demand arising from the Local Plan if no mitigating measures are adopted.

The data presented Unfortunately, only limited results are available. The consultants' report (CYC/87a) only provides selective information on changes in traffic flow and in queue lengths; fuller information is clearly available but has not been provided. The only comprehensive data is on travel times for selected routes, and we have focused on these in our responses to the Inspectors' questions above. It is important to note that it is not possible, as a result, to compare these results with those in the 2019 Transport Topic Paper, which predicted that travel times would rise by 35%, and congestion by 65%. The Transport Topic Paper estimated that the number of journeys would rise by between 20% and 25%, which is higher than the 15% for car journeys in the current reports. Thus, while we might expect the current results to show travel times and congestion increasing, the impacts on congestion will probably be smaller than in the 2019 results.

The alternative scenarios CYC/87 makes the point that the changes in travel time for the routes assessed are generally very similar between the two scenarios of development on the specified sites and development distributed across the city. It then suggests that the concentration of growth in the proposed set of developments is, on balance, preferable to wider distribution of growth across the city. This is a plausible argument, but it is important not to lose sight of the point that the increased development envisaged will in either case add to traffic levels, travel times and (though not demonstrated in the results presented) congestion. The question remains, therefore, as to how the Local Plan can be made more sound by demonstrating that, as specified in Para 3.12, new development will not lead to increased congestion, will facilitate the use of sustainable travel, and will minimise the future growth of traffic. It is clear to us that significant increases in the share of sustainable

travel will be needed. This is reinforced by the Council's recently published draft climate change strategy, which sets targets for a 25% increase in bus use and a 33% increase in active travel by 2030.

