



York Civic Trust

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Inquiry into York's draft Local Plan: Phase 3

Written Statement in connection with Matter 7 – Land West of Elvington Lane

4th July 2022

This statement in relation to Matter 7 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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General Points:

York Civic Trust's answers to questions 7.1, 7.2 and 7.4 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 a number of 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 policy SS13.

This position is reinforced in our consideration of ST15 as the cost of delivering the infrastructure requirements of approximately £68 million raises serious questions about the viability of the development at its current scale.

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 our submission on Matter 4. We conclude there that reports CYC/87 and CYC/87a reinforce the need for the Council to identify and assess ways of mitigating the impacts of development on transport-related carbon emissions and congestion. 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 7.1 Is the allocation and associated policy SS13 relating to ST15 soundly based?

Policy SS13 relating to Land West of Elvington Lane (ST15) sets out the development of a sustainable garden village of 3339 dwellings with approximately 2200 units being delivered in the plan period. This will only provide a population of 5000 people within the plan period and a total population of 8000. York Civic Trust have 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.

ST15, the largest development in the plan, falls short of this proposed development minimum. The allocation relating to ST15 has been reduced considerably from the initial proposal of 5580 dwellings set out in the 2013 proposals map. In that proposals map, ST15 was bounded and by the A64 thus creating a development with significantly smaller infrastructure costs. The reduction of the size of the development and the insertion of green belt between the development and the A64 to create a detached settlement adds to its cost and makes it much harder to provide for sustainable travel.

Principle III - York Civic Trust welcomes the ambition of Policy SS13 Principle III to 'be of a high design standard'.

Principle IX – Policy SS 13 Principle IX requires an 'appropriate range of shops, services and facilities including social infrastructure such as health, social, leisure, cultural and

community uses to meet the needs of future residents, made early in the scheme's phasing in order to allow the establishment of a new sustainable community', with such facilities provided in a new local centre. York Civic Trust is unconvinced that the population of 5000 to be achieved during the Plan period would be sufficient to sustain such provisions. We would prefer to see this resolved by increasing the planned housing provision, (and hence population). Failing that it will be necessary to impose strict enforcement to ensure that these facilities are provided and sustained.

Principle X – Policy SS 13 Principle X commits to 'new on-site education provision to meet nursery, primary and potentially secondary demand'. York Civic Trust welcomes this, but questions whether it is feasible to provide for secondary education on site. Evidence suggests that a minimum population of 12,000 is needed to justify even a three form entry secondary school. Without such provision, the nearest secondary schools are at least two miles from the site, and will result in significant car traffic to access them. Experience with Dunnington, at a similar distance from the city centre, and where parents have to act as voluntary marshals for pupils travelling by bicycle, illustrates the unacceptability of such provision.

Principle XI – Policy SS 13 Principle XI requires that the 'impacts of the site individually and cumulatively with site's ST7, ST8, ST9, ST14, ST27, ST35 and ST36 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 to our submission on Matter 4, and outline the implications for ST15 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 ST15.

We understand that the tests of the three alternative arrangements for accessing ST15 demonstrated clearly that accesses would be needed both directly through a new grade separated junction on the A64 and indirectly through an access to Elvington Lane. With both of these in place, travel times on the A64 are predicted to rise by around 5% between 2019 and 2033, suggesting that this provision is sufficient to cater for the vehicular traffic generated. The expansion of the site to 4000 dwellings by 2040 has little further impact. However, as noted, these provisions are very expensive; the total cost of road access to the site is shown in CYC/79 as £68m. It will be extremely important, therefore, to assess whether these costs can be reduced, and current travel times on the A64 maintained, by introducing mitigating measures. These should include providing services on site to reduce journey lengths, promoting active travel for links to the university and the city centre, and providing the high quality public transport which is committed, but has not yet been tested. We are particularly concerned that, if developers are faced with a significant cost for highway provision, they will be more reluctant to provide financial support for such services or for other crucial elements such as affordable housing. We encourage the Inspectors to return to this question in Phase 4, and to ask the Council to conduct the necessary analyses in advance.

Principle XII – Policy SS 13 Principle XII specifies ‘provision of necessary transport infrastructure to access the site with primary access via the A64 (as shown on the proposals map) and a potential secondary access via Elvington Lane.’ We note that, in its latest analysis, the Council concludes that both of these accesses will be required to support access by motorised vehicles. In CYC/79 the Council proposes allocating £68m to these links and improvements at Grimston Bar. It only allocates £2m to public transport access and £4m to access by active modes. We very much doubt that a development with so small a population can justify such a high level of committed expenditure by developers. But we are also concerned that it implies a dominant emphasis on access by car, and a ccess to the wider road network rather than to the city of York. This is likely, from experience elsewhere, to lead to the creation of a dormitory village, with commuters destined for other employment centres, such as Leeds, which will add little to the development of York as a sustainable city.

Principle XVI – Policy SS 13 Principle XVI commits to the delivery of ‘high quality, frequent and accessible public transport services through the whole site which provide links to new community facilities, as well as to York city centre and other appropriate service hubs, including University of York. A public transport hub at the local centre should provide appropriate local interchange and waiting facilities for new residents. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.’ In CYC/79, the Council states that ‘a segregated route [for buses] over the A64 will be provided to ST15’. Yet this scheme is not included in the list of costed infrastructure measures, and we conclude that no attempt has yet been made to design or assess such a link. Indeed, it is unclear what form such high quality, frequent public transport services would take. Possibilities include extending the park and ride service from Grimston Bar and the University bus services from Campus East. But both of these would add significantly to the cost of such services, and potentially reduce the quality of service for existing users. We are convinced that the only solution is a dedicated service between the site and the city centre, complementing these existing services and coupled with a significant increase in bus priorities to support them all. However, as we note above, we very much doubt that such a service could become commercially viable with so low a planned population. Policy SS13 para 3.67 requires a detailed analysis to confirm that sustainable travel options are realistic and financially sound. York Civic Trust has recommended within its Transport Strategy for York (February 2022) that a Very Light Rail line could be considered to connect ST15 to York providing the beginnings of a congestion free public transport network for the city.

This is a matter which must be resolved before approval is given to this strategic site. We strongly recommend that the Inspectors return to this issue in Phase 4 of the Inquiry, and instruct the Council in the meantime to present evidence as to the effectiveness and viability of the solution which it proposes.

Question 7.2 Are the Green Belt boundaries reasonably derived?

York Civic Trust welcomes the reversion of previously developed land currently part of Elvington Airfield to be part of the green belt. The detachment of ST15 from the A64 by the insertion of green belt unreasonably restricts the size of the settlement, increases

infrastructure costs and encourages a reliance on car journeys over sustainable transport modes. This weakens the sustainability criteria of the proposed 'garden village'. We recommend that the green belt between the site and the A64 is used instead as part of the development, thus enabling the population to be expanded, which would in turn make services to it more viable. Potentially the area closest to the A64 could be used for employment, thus providing additional local facilities for residents and shielding the housing from the main road.

Question 7.4 Is the allocation viable and deliverable given the infrastructure requirements, in particular?

York Civic Trust questioned the justification for the relevant elements in the 2018 Infrastructure Delivery Plan and the effectiveness of these infrastructure projects in delivering the outcomes of the IDP. York Civic Trust in its answer to Phase 2 Question 6.1 recommended that the Inspectors ask the Council to carry out further analysis into the predictions of substantial increases in travel, travel time and delay as outlined in para.4.7 of the IDP in advance of Phase 4 of the Inquiry. This analysis should inform the question of viability of the infrastructure requirements of ST15. As noted above, we strongly recommend that the Inspectors defer a decision on these matters until Phase 4.

In our supplementary statement of 26th May 2022 on paper EX/CYC/79 in connection with Matter 6, we noted the imbalance in expenditure on infrastructure required to support strategic sites ST4, 5, 7, 8, 9, 14, 15 and 17 with a notional total of £242million for highways, as compared to only £3.5million for bus improvements to ST7, ST14 and ST15 and £6million for cycling and walking improvements. This imbalance, which can be clearly evidenced in the infrastructure requirements of ST15, will lead to an increase in demand on the road network and is counter to the statement in EX/CYC/79 that infrastructure measures are included 'to ensure transport impacts of new developments are mitigated; including reducing demand on the road network through infrastructure projects to deliver a significant modal shift towards walking, cycling, and bus travel.'

As we note under Principle XI above, the overall transport infrastructure costs of £76m to support this site raise serious questions about its economic viability. Strategic Site ST14 would not require such expenditure, because it is better connected to the existing network; indeed, CYC/79 only allocates £11million to it. York Civic Trust suggests that consideration should be given to transferring the allocation of ST15's 3339 units to ST14, since this would both considerably reduce infrastructure costs per dwelling and create in ST14 a 'garden village' of a size sufficient to support the services which it will need.

