

## York Labour Party (YLP) Phase 3 MIQ Response

### Matter 7: Land West of Elvington Lane

Inspector's Question	Our response	References
<p>7.1 Is the allocation and associated Policy SS13 relating to ST15 soundly based?</p>	<p>In our previous submissions we made the case in our answers to Phase 2 Questions 1.2, 1.3 and 4.2 for a minimum size of the new settlements in the Plan, to ensure that the community can support the services which it needs and be relatively self-sustainable. We referenced the York Civic Trust's work suggesting a minimum population of 15,000 which equates to 6500 dwellings (Sustainable Communities Workshop, YCT, 2021). We evidenced in our phase 2 written submission above that a population of at least 12,000 is needed to support a free-standing commercial bus service, a surgery and a secondary school, and additionally in regard to affordable housing provision in our comments on matter 1.2 earlier.</p> <p>ST15, the largest development / new settlement in the plan, also falls short of this proposed development minimum. The allocation relating to ST15 has been moved and reduced considerably in size from the initial proposal set out in the 2013 proposals map. In that proposals map, ST15 was bounded by the A64 thus creating a development with significantly smaller infrastructure costs, and one physically close with easy potential links to the University of York's East Campus and proposed extension for which it could have readily helped address accommodation and spin out employment space shortfalls that couldn't be met on the restricted two campus sites. The reduction of the size of the development and its added distancing from the main urban area and the A64 makes it much harder to provide for and achieve sustainable travel. Any walking is unlikely, and even cycling will probably be minimal.</p> <p>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</p>	<p><a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a></p>

	<p>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. We do not think that the population of 5000 to be achieved during the Plan period will be sufficient to sustain such provisions. A local GP surgery is highly unlikely. We would prefer to see this resolved by significantly 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.</p> <p>Principle X – Policy SS 13 Principle X commits to 'new on-site education provision to meet nursery, primary and potentially secondary demand'. We support this, but question whether it is feasible to provide for secondary education on site. The evidence we submitted on phase 2 Matters 1 &amp; 4 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.</p> <p>We further note that the Council's very recently submitted 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 have not had time to fully digest these two documents but note that the York Civic Trust have provided a fuller assessment of these documents in the annex to their submission, and an outline of the implications for ST14 in their main submission, which we would draw the Inspector's attention to. We note the Trust's statement that they 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</p>	
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	<p>traffic generated. The expansion of the site to 4000 dwellings by 2040 has little further impact. However, these provisions are very expensive; the total cost of road access to the site is shown in CYC/79 as £68m, and this does not appear to meet all National Highways concerned as evidenced in the Statement of Common Ground with the Council submitted during the Phase 2 hearings. It will be extremely important, therefore, to assess whether these costs can be reduced, and current travel times on the A64 broadly 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 proposed, 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 (see also our response to 7.4).</p> <p>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 access 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.</p>	
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	<p>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. This might mean the only practical 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.</p> <p>This is a matter which must be resolved before approval is given to this strategic site, and the overall allocations. We strongly recommend that the Inspectors return to this issue in Phase 4 of the Enquiry, and instruct the Council in the meantime to present evidence as to the effectiveness and viability of the solution which it proposes.</p>	
7.2 Are the Green Belt boundaries reasonably derived?		
7.3 Does the proposed allocation respond		

adequately to the presence of the SINC?		
7.4 Is the allocation viable and deliverable given the infrastructure requirements, in particular?	<p>No, as we argued in previous submissions, particularly in our phase 2 Matters 1 questions 1.1 &amp; 1.2, 4.1. As we say above, this is likely to be even more the case with the revised scale of the projected traffic, the infrastructure costs already at £76 million, and the outstanding issues flagged in the National Highways / Council Statement of Common Understanding throwing even more questions up on this. So too will the work on the impact of the proposed mitigations the Council has promised to produce in advance of Phase 4 of the Enquiry, which will probably need enhancing significantly if they are to meet the Council's 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.'</p> <p>However we suspect this work is more likely to point to the better solution being to revert to the previous 2013 ST15 site. We would ask the inspectors to specifically recommend the latter option is examined in the Council's further work. We would also recommend that the Inspectors defer a decision on the allocation until this has been done for Phase 4. The scale of these costs are crucially likely to severely compromise the current reduced sites ability to deliver the anticipated level of affordable housing too, again reinforcing the case for a much larger development to spread the costs and keep the affordable housing numbers up, better meet the city's needs for more housing, and more affordable housing and to deliver that in a more sustainable manner.</p>	HS/P2/M1/SV/16 & HS/P2/M4/SS/21