

York Labour Party (YLP) Phase 3 MIQ Response

Matter 4: Strategic Sites

Inspector's Question	Our response	References
<p>4.1 Is the allocation and associated Policy SS4 relating to ST5 soundly based?</p>	<p>We wish to protect the upper end employment allocation, and to reiterate the points we made in our previous submissions about offering a wide flexible range of employment spaces and addressing the severe imbalance in job opportunities in the City. The employment benefits of this incredibly well located site relative to the station and the national rail network, with the major opportunities that offers for improving York's economic base, including to deliver a site for the great British Rail HQ and a new Rail Academy in the city to address the known and projected specialist staff shortages in the rail industry, must be protected.</p> <p>We would also reiterate our concerns about the excessive housing target for the site, which will result in it failing to address local housing needs because of price, the wrong mix of accommodation types, limited affordable housing and the latter being too much of the wrong form to meet the predominant social rent need identified in the 2016 SHMA.</p> <p>Finally we would reiterate our support for a far more sustainable design for this central site in transport terms, based on a stronger set of design principles and strengthened transport policies as outlined in our previous submissions.</p> <p>Otherwise we are generally supportive of policy SS4 and its principles and strongly support them as the right framework for the sites development.</p>	<p>SID 364, PM SID 364, HS/P2/M3/ED/7</p>

	<p>In support of this approach we note, as has inevitably happened as a consequence of the excessive housing target, that the approved outline application (18/01884/OUTM) and Reserved Matter Application Phase 1 Infrastructure (20/00710/REMM) contains little provision for social and communal infrastructure. In particular, there is an absence of health and education facilities for the site. Many facilities in the surrounding areas are already inadequate and overloaded. The applications Environment Statement (Vol. 4 Non-Technical Summary, 6.14) acknowledges 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).</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 ST5 in their main submission, which we would draw the Inspector’s attention to. They highlight the unacceptable traffic and congestion implications of the approved form of development, with excessive parking including two new multi-story car parks, and a new through road - against the aims of Policy T1 to discourage traffic and the NPFs overarching aim of delivering sustainable development. We would like to see the need to restrict or remove through traffic and a lower parking ceiling explicitly incorporated into the principles in Policy SS4.</p>	
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	<p>We also note that York Civic Trust strongly believes that the environmental assessment for York Central is based on unsound information and analysis and support their call for it to be reassessed to examine the impact of York Central on completion in 2033.</p> <p>In conclusion, we would wish to see the Council working with the site development partners to address these concerns through an evolution of the existing proposals so as to address the major shortcomings of the existing outline approval. The retention of a strengthened local plan policy would provide the right framework for this.</p>	
4.2 Is the allocation and associated Policy SS6 relating to ST1 soundly based?		
4.3 Is the allocation and associated Policy SS7 relating to ST2 soundly based?		
4.4 Is the allocation and associated Policy SS8 relating to ST4 soundly based?		
4.5 Is the allocation and associated Policy SS15 relating to ST17 soundly based?		
4.6 Is the allocation and associated Policy SS17 relating to ST32 soundly based?		

<p>4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?</p>	<p>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.</p> <p>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.</p> <p>When compared with the initial proposal (2013 Proposal Map) ST7 has been reduced in size and 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 iii [statement on infeasibility of providing a shopping centre?]</p> <p>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.</p>	
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	<p>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 have not had time to fully digest the contents 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 ST7 in their main submission, which we would draw the Inspector’s attention to. This suggests that traffic mitigation measures will be needed throughout the Hull Road corridor, including for ST7, as a result. We await the Council’s assessment of such measures in time for Phase 4 of the hearings.</p>	
<p>4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?</p>		
<p>4.9 Is the allocation and associated Policy SS10 relating to ST8 soundly based?</p>		
<p>4.10 Are the Green Belt boundaries of the ST8 site reasonably derived?</p>		
<p>4.11 Is the allocation and associated Policy SS11 relating to ST9 soundly based?</p>		
<p>4.12 Are the Green Belt boundaries of the ST9 site reasonably derived?</p>		

<p>4.13 Is the allocation and associated Policy SS12 relating to ST14 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.</p> <p>ST14, the second largest development / new settlement 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 considerably 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, and to address the need for adequate space for a full range of local facilities.</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 conclusion that the dualling of the Outer Ring Road (including south of this site) “is insufficient to counter the impacts of the</p>	<p>https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</p>
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	<p>new developments proposed in the Plan, and that mitigation measures will be needed”. 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. The Trust sees little point in including such commitments in the draft Local Plan if they are not acted upon, and we wholly concur.</p> <p>The Trust also point out that the only current proposal is to extend the tortuous Route #6 to service the development, and to make use of the Route #40, which offers an hourly service on Wigginton Road. Neither service bears any resemblance to the ‘high quality, frequent’ service which is promised in the Plan, and they offer no realistic potential of achieving anything close to the Principle IX 15% public transport mode share envisaged. York Labour Party referred to the potential of reinstating the Council’s previously proposed new park and ride facility immediately south-west of the A1237/Wigginton Road junction, with high frequency electric buses running on from there via Clifton Moor and the new cross ring road PT facility to 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.</p> <p>A much larger site, as we have consistently suggested for sustainability reasons but also to address the inadequate housing provision in the current plan, would be more able to afford to deliver the Principle VIII & IX proposals to include infrastructure to protect public transport journey times on the upgraded ORR junction approaches, the opportunity to provide grade separated, dedicated</p>	
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	<p>public transport (and active travel) routes across the A1237, and to secure the additional Park and Ride site and run on. The proposals for the outer ring road upgrade are now well advanced, and subject to an imminent planning application. York Labour Party supports this upgrade, but only on the basis that it is delivered with accompanying measures to reduce the amount of traffic within the ring road. A strengthening of the requirements for these sustainable transport modes in this policy as outlined would be crucial to delivering a sustainable development here.</p>	
4.14 Are the Green Belt boundaries of the ST14 site reasonably derived?		
4.15 Is the allocation and associated Policy SS14 relating to ST16 soundly based?		
4.16 Are the Green Belt boundaries of the ST16 site reasonably derived?		
4.17 Is the allocation and associated Policy SS16 relating to ST31 soundly based?		
4.18 Are the Green Belt boundaries of the ST31 site reasonably derived?		
4.19 Is the allocation and associated Policy SS18 relating to ST33 soundly based?		

4.20 Are the Green Belt boundaries of the ST33 site reasonably derived?		
4.21 Is the allocation and associated Policy SS20 relating to ST36 soundly based?		
4.22 Are the Green Belt boundaries of the ST36 site reasonably derived?		