

York Civic Trust
Local Plan Statement of Common Ground

DRAFT

from YCT V1.5
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Introduction

This Statement of Common Ground (SoCG) has been prepared jointly between City of York Council and York Civic Trust.

York Civic Trust (YCT) is a membership organisation, open to all who wish to enhance and protect York's architectural and cultural heritage, to champion good design and to advance the high place which York holds amongst the cities of the world. Its vision is 'promoting heritage, shaping tomorrow'. Its 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.

YCT submitted a series of observations in 2018 on aspects of the draft Local Plan which it considered unsound, and suggested ways in which they could be made sound, for the benefit of the future of the City of York. Further discussions with the Council have led to the resolution of some of those concerns. The remaining ones are referred to in this Statement, and have formed the basis for YCT's submissions to the different phases of the Local Plan Inquiry.

YCT works closely with the Council on heritage and planning within the city.

Areas of agreement

York Civic Trust has been concerned for some time at the lack of a Local Plan for York. It is strongly supportive of the steps which the Council has taken to secure a Local Plan. It is committed to helping to secure a Local Plan, based broadly on the current draft, but subject to the reservations outlined below.

YCT and the Council are in agreement that York needs to adopt an approach in which new development and increases in population and employment are in balance with the preservation of the city's heritage and setting. A key element of this strategy must be growth which, as far as is reasonably possible, concentrates new housing and employment in locations where services are provided and sustained locally and where it is easy to access the remainder of the city by sustainable transport. For many developments this access will be achieved through existing high frequency rail and bus routes and by existing active travel

routes. For some developments there will be a need to provide new bus, cycle and walking routes.

YCT and CYC are in agreement on a number of key policy areas as outlined within the Local Plan, including Development Principles DP1, 4 and policies on Retail, Health and Wellbeing and Education.

YCT agrees with the principles of Sustainable Access included in Policy T1, apart from some reservations on particular targets for bus access. It agrees that these principles should be applied to all strategic sites.

YCT and the Council are agreed on the need to produce a new Local Transport Plan (LTP4) which is compatible with and supportive of the Local Plan. Both note that the Department for Transport now expects local authorities to update their Local Transport Plans to reflect revised Local Plans. . YCT would like to see the final version of the Local Plan refer to consistency with whichever version of a Local Transport Plan is current at the time that a decision is taken. References to LTP3 will rapidly become obsolete and we anticipate that the Inspectors will recommend that these are removed.

Areas of broad agreement

YCT is in broad agreement with Development Principles 2 and 3. However, it would like to see DP2 emphasising the need for the major strategic sites to have a large enough population to support and sustain the full range of local facilities that they need. It also wishes to see an expanded set of design principles in DP3 which reinforce the achievement of a reduced need to travel and a greater emphasis on sustainable travel. These include the need for mixed use and high-density development, access by active travel to local facilities, management of servicing traffic and support for emerging transport and communications technologies.

YCT is in broad agreement with Policy SS1, but wants it expanded to ensure that the largest free-standing strategic sites are of sufficient population size to support and sustain local facilities including, at least, a primary school, a doctors' surgery and a high frequency seven day per week bus service. It wishes to see an objective analysis of the minimum population size required to achieve this. Where such a population size cannot be achieved, it expects to see commitments to such services being supported on a continued basis.

YCT agrees with the need for a Sustainability Appraisal to identify the most appropriate locations for strategic development, and is fully supportive of the guide questions used to conduct the appraisal. It is not convinced, however, that the site assessment criteria reflect those guide questions, and wishes to see a robustness test in which criteria are better reflective of the guide questions are applied (for example...?).

YCT agrees with the broad thrust of the policies on Economy (EC1-5). However, it is concerned that the continued lack of a Tourism Strategy (Policy E4) is allowing piecemeal development of hotels and tourism facilities to take place to the detriment of the environment and heritage. It will raise these concerns in Phase 4 of the Inquiry.

YCT is broadly supportive of Policies T3, T6 and T7. It would like to see additional facilities provided at York Station (T3) (for example...?). It agrees that placing new development near to existing bus routes will both reduce private vehicle trips from those developments and contribute to the viability of the existing bus network (T6). It wishes to see tighter standards applied for the management of travel generated by new developments (T7 and elements of T1). It will submit observations on these to Phase 4 of the Inquiry.

YCT is fully in agreement with the Council's hierarchy of users (as specified in LTP3) which gives priority to pedestrians, then people with mobility handicaps, then cyclists, then public transport, and then freight and private vehicle users. It would like to see this hierarchy clearly specified in the Local Plan, and reflected in the revised modal policies T2, T4, T5, T8 (see below). It expects the hierarchy to be central to the next Local Transport Plan.

Areas of disagreement

Special Strategic Sites

YCT considers that in some respects the principles above have not yet been applied to specific strategic sites. For York Central it does not consider that the planned parking provision and bus service access are compatible with the principles of sustainable travel, and it is particularly concerned that the plans provide for through traffic on newly developed roads, which is incompatible with Policy T1.

YCT believes that more sustainable outcomes could be achieved if the three standalone sites (ST7, ST14, ST15) were larger and therefore better able to support local services, including high frequency bus services. It will submit observations on these points to Phase 3 of the Inquiry.

Placemaking and design

YCT believes that there is insufficient commitment to conserving and enhancing the outstanding built heritage of the city. In key sections on Conservation Areas, Listed Buildings and the significance of non-designated heritage assets (Policies D4; D5; D7), too much weight is given in favour of development rather than to protection of the city's historic environment, leading to the risk of harm to the city's unique heritage. This is an insufficiently positive strategy for the conservation of York's historic environment. This is particularly problematic in Policy D7, where there is a noted absence of commitment from City of York Council to protecting the city's non-designated heritage assets, including those nominated by York's communities on the Local Heritage List.

Transport

YCT is concerned that Policies T2, T4, T5, T8 and T9 still reflect schemes and timescales which were developed in LTP3, which is now 11 years old. It considers that more should be done to support public transport (T2) and active travel (T5), that there is an over-reliance on highway provision (T4), and that the proposals for demand management are incompatible with the aspirations in Principles DP2 and DP3 and Policies SS1 and T1 (T8). It considers that more needs to be said on Freight, and that this should be treated separately from alternative fuels (T9). It will elaborate on these points in its submission for Phase 4 of the Inquiry. It would like to see a clear recommendation that these policies are updated in the light of further analysis.

As indicated in its evidence to Phase 2 of the Inquiry, YCT is unconvinced by the assessment conducted for the 2019 Transport Topic Paper. In particular it is concerned that that analysis does not satisfy the guidance for NPPF2012 provided by DfT in 2015. To do so it needs a clear identification of measures which would mitigate the problems of increased travel, pollution and congestion forecast in that document. YCT expects that such an analysis would lead to the enhancement of Policies T2, T4, T5, T8 and T9.

Items on which YCT and CYC have yet to reach agreement

YCT believes that the Council should have a clearer strategy for managing trips within developments to minimise private vehicle trips. YCT believes this should form part of the Council's submission to Phase 3 of the Examination.

YCT wishes to see a more developed strategy for mitigating trip growth caused by Local Plan development, as outlined above. YCT welcomes the offer by the Council to present such an analysis to Phase 4 of the Examination, but reserves judgement until it has seen the outcome of that analysis.