

Response to Inspector's MIQs (National Highways) – 31/08/2022

Matter 7 – Transport and Air Quality

Question 7.1 asks whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of development or will the residual cumulative impacts be severe?

Since 2013, National Highways (NH) has worked to support City of York Council (CYC) in developing an evidence base in support of the Local Plan. Both CYC and NH accept that there will be a need to mitigate the growth of trips on the A64, and the locations where mitigation will be required (as set out in the Statement of Common Ground in relation to the Strategic Road Network, dated 6 July 2022).

The CYC Local Transport Plan Modelling – Transport Impact Assessment Report (June 2022) identifies significant queuing at the A19 / A64 Fulford junction in both 2025 and 2033 scenarios. The A19 / A64 Fulford Road junction is referred to as suffering from particular impacts as a result of Local Plan growth in the CYC Local Plan Infrastructure Delivery Strategy: Update Note for Phase 2 Local Plan Independent Examination (May 2022). Additionally, the CYC Infrastructure Delivery Plan (May 2018), forecasts high levels of delay on Fulford Road.

This finding is echoed in our own modelling work, with the results being summarised in the current joint SoCG. The SoCG outlines that by 2025, queuing impacts are expected at the A19 / A64 Fulford junction if no mitigation schemes are developed. These impacts are expected to worsen by 2033 and 2040, where queues from the eastbound diverge at Fulford junction are expected to extend beyond the Askham Bar junction on the A64 – without intervention this would cause safety concerns which are predicted to extend over a significantly longer stretch of the A64, and a significantly longer time period. It is stated under 'Areas of Agreement' within the SoCG that Aimsun modelling and DMRB CD 122 assessments undertaken by NH have identified that mitigation measures are required at the A19 / A64 Fulford Road junction.

We are aware that schemes are being developed by CYC to encourage the use of sustainable modes on the Fulford Road corridor. We understand that these will reallocate road space to sustainable modes, hence further work will evidence the extent to which they will mitigate the car-based queue observed from the eastbound diverge at the Fulford junction. Once completed by the Council in future, this will then be tested. CYC has undertaken some early testing of a scheme to 'meter' traffic on the A19 northbound south of the junction, which will benefit traffic downstream on the A19 and also those accessing the Designer Outlet and Park and Ride from York and the A64. We will await in the future further conclusive evidence that mitigation schemes currently being investigated by CYC will mitigate significant impacts at the A19 / A64 Fulford Road junction.

Further to CYC's testing of metering at the Fulford junction, NH has also undertaken some preliminary testing of a signalisation of the A19 northbound approach (at the southern dumbbell of the Fulford junction). This illustrates that signalisation may be used to protect the operation of the SRN in the short term (to 2025), which transfers queues to the A19 northbound approach to the junction, from the Selby district. Further consultation CYC and North Yorkshire County Council Hihgways would be required to confirm whether this is acceptable to them.

We would suggest that improvements to the operation of the A19 / A64 Fulford Road junction (to mitigate the impacts of the Plan) are likely to consist of junction and downstream improvements, with the full scale and nature of these improvements having not yet been identified as yet, and which can be prepared by the Council in the future. We will continue to work with CYC to help them develop these.

Question 7.2 asks whether Policies T1 to T9 are justified and whether they would be effective?

With regards to Policy T4: Strategic Highway Network Capacity Improvements, given the identified impacts and the need for mitigation at the A19 / A64 Fulford Road junction as outlined above, we would suggest that the following words could be inserted under the 'Medium-term (2022/23 – 2027/28) heading:

vii. Improvements to the operation of the A19 / A64 Fulford Road junction, which are likely to consist of junction and downstream improvements (in order to ensure the safe and efficient operation of both the local and strategic road networks in this location).

Matter 12 – General Development Management

Question 12.4 of Matter 12 asks whether the approach of Policy DM1 to infrastructure and developer contributions is justified?

We acknowledge that Policy DM1 states that CYC will seek contributions from developers to ensure that the necessary infrastructure is in place to support future development in York. The policy states that required strategic infrastructure, the timescale for its delivery and the anticipated funding streams for its provision, are set out in the support IDP. We have reviewed the IDP and note that it states that the document will inform the approach to calculating and securing developer contributions for strategic infrastructure and providing infrastructure to service and mitigate the direct local impacts of development through conditions and developer obligations.

Paragraph 15.12 of DM1 states that CYC will prepare a further planning document which will set out the mechanism through which developer contributions will be sought. Further reference to this is made within the Phase 2 Infrastructure Delivery Strategy (IDS): Update Note for Phase 2 Local Plan Independent Examination (May 2022), where it is stated that it is CYC's intention to develop this IDS document over the coming months and this will then inform the approach to securing infrastructure associated with developer proposals, and further bids for funding to support development.

We are aware that the IDS notes that the introduction of a Community Infrastructure Levy (CIL) is being considered by CYC, as it provides a more flexible tool to respond to the variations of levels of capacity within existing infrastructure networks and facilities. The IDS also acknowledges the potential introduction of a non-negotiable Infrastructure Levy as part of the Levelling Up and Regeneration Bill. We would only wish to highlight the urgency at which the mechanism for calculating and securing developer contributions is written, on the basis that a number of Local Plan sites are now in the planning system, or have been determined (as evidenced by Examination document EX/CYC/107/5 Planning Applications and Appeals on Allocated Sites Note August 2022).

This means that the opportunity to collect contributions from developers towards strategic cumulative impact schemes, such as improvements to the Fulford junction, diminishes with each application determined.

The IDP states that “if it becomes clear that funding is not available, and schemes cannot go ahead, then this could trigger a review of the development levels included in the Local Plan and a review of the timescales for the delivery of strategic infrastructure”. National Highways would only wish to ensure that any risks to future Local Plan delivery and scheme funding, be identified early by the Council should funding for key required infrastructure not be available.

The IDP mentions alignment with City of York Local Transport Plan 2011-2031 (LTP3), and as we understand, new guidance for LTP4 is soon to be released by Government and that there will be a stronger focus on funding attached to forthcoming LTP4s. Given the funding and evidence base around a scheme to mitigate Local Plan impacts at the Fulford Road junction, and the relationship between the local and strategic road networks in this location, we would request that the Fulford Road corridor (and junction) would form a key focus of CYC's LTP4. We feel it would be beneficial to undertake a future joint detailed study to understand development impacts along the corridor, the full potential for sustainable modes, and the interactions of both networks with the modelling already undertaken.

We acknowledge and support that the IDP should remain a live document, and that it is updated soon to reflect the current IDS developed in support of the Examination (the current IDP being 2018).

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