

CITY OF YORK LOCAL PLAN PHASE 4 HEARINGS

RESPONSE TO INSPECTORS' MIQs

FROM HESLINGTON PARISH COUNCIL

AUGUST 2022

Matter 7 – Transport and Air Quality

7.1 Will the transport impacts of the Plan fall within reasonable bounds? In other words, having regard to paragraph 32 of the Framework, can improvements be undertaken within the transport network that cost effectively limit the significant impacts of development or will the residual cumulative impacts be severe?

NPPF para 32 p9 states that “all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether”:

- “the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;”

The lack of existing road infrastructure for the largest housing strategic housing site, ST15, which is also too distant from York centre to make Active Travel a viable option for most people for most journeys, necessitates major road building at great expense. Initially it is planned (EX/SoCG/21 and EX/SoCG/21a July 2022) for the first 1000 houses to feed into Elvington Lane. This too will need a significant upgrade as well as re-designing Grimston Bar GSJ. This will be true whether it is for private vehicles or the proposed frequent bus service.

Once en route, even if we estimate only 50% are bound for York, it must add to congestion on routes into UoY (Field lane) and via Hull Road into York. Both these already have significant congestion at busy times.

- “safe and suitable access to the site can be achieved for all people;”

ST4 traffic is planned to enter Field Lane from a single access road. Field Lane is already a traffic congestion point with stationary traffic frequent along its length and along feed roads including around two sides of Lord Deramore Primary School (Field Lane and School Lane). UoY increase in activity, whether more intensively on the existing campuses or as ST27, will inevitably increase traffic associated with these routes too, adding to already congested roads.

In addition, the proposed raised GSJ onto the A64 for ST15 will import noise, air and light pollution into an area that is currently relatively untainted. The elevated nature of the GSJ

and the link roads to it will cause these three polluting elements to spread far from the junction.

- “improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

We suggest that the cumulative impacts of the proposed developments will be severe and may render it unsound. Adding significantly more vehicular traffic onto an already busy road is neither safe nor suitable. Cumulatively, the 3 strategic sites within Heslington Parish will increase air, light and noise pollution both directly as traffic passes by Heslington Village, or stationary in congestion, and indirectly as traffic from within the Parish backs up at junctions.

7.2 Are Policies T1 to T9 justified and would they be effective?

It is unclear whether or not the proposal to redefine rural lanes south-east of Heslington Village as appropriate cycle/pedestrian routes is strategic or notional since Heslington is not listed in T5 (Strategic Cycle and Pedestrian Network Links and Improvements) although posited as a possibility in SS13 (xiii). However, as we have explained in our statements in Phase 3, HPC is very concerned about the safety of this proposal and its impact on the ability of existing residents and businesses to go about their business.

Considering the costs of the necessary new, or significantly upgraded, road links for ST15, HPC suggests that the incorporation of high quality Active Travel provision into the new link roads would be a relatively minor additional cost, and probably less, overall, than the cost of making new cross-country routes and upgrading existing lanes estimated at over £4 million, plus annual £40,000 maintenance (Sustrans NCN 66 Heslington (York) to Elvington Feasibility Design Report June 2022

<https://democracy.york.gov.uk/documents/s160764/Annex%209%20-%20Feasibility%20Report%20-%20Heslington%20to%20Elvington%20v1.0.pdf>).

Creating proper segregated cycle/pedestrian routes would remove the need to use the existing lanes and prevent conflicts between different modes of transport. During the recent pandemic lockdowns, there was a big increase in people using the lanes for exercise. During that time, we saw the impact of increased cycle/pedestrian usage on safety. This was largely due to cyclists/pedestrians not following the highway or countryside codes, and not understanding the stopping distance and manoeuvrability of large farm plant and lorry loads of crops or manure. The lanes south-east of Heslington are a working agricultural rural area, not a park.

In any case, the policy SS13(xiii) would not be effective in keeping motorised traffic off country lanes and out of Heslington Main Street since they would be accessible to

motorbikes, as confirmed by Sustrans (Heslington Parish Council minutes February 2022) and explained by our statements to Phase 3 Hearings.

7.3 Will the (cumulative) effect of the Plan on air quality be acceptable?

As stated in 7.1 above, we suggest that the cumulative impacts of the proposed developments will be severe. Please see also 7.4 below.

7.4 Will Policy ENV1 prove effective?

Between them, ST15, ST4 and ST27, which are wholly within Heslington Parish, include all the criteria (NPPF2012 para 12.8, p196) that would trigger the requirement for a detailed emissions assessment and/or a full air quality impact assessment as shown in the table below.

| Criteria from NPPF 2012 | Applies in Heslington Parish | Comment |
|--|------------------------------|--|
| generate or increase traffic congestion | √ | please see 7.1 above |
| significant change in traffic volumes | √ | please see 7.1 above |
| significant change in vehicle speeds | √ | both increased speed on new link roads to A64 and decrease speed on more heavily congested roads close to Heslington Village and with potential for back up from the new GSJ on A64 and link roads to it. If the lanes south east of Heslington Village were allowed to become cycle/pedestrian routes then motorised traffic must also decrease speed due to the narrowness of the lanes. |
| alter the traffic composition on local roads | √ | from few private vehicles and more farm and agricultural traffic to more private vehicles, buses and delivery vehicles |
| new exposure close to existing sources of air pollutants, including road traffic | √ | New link road to A64 adding to existing A64 pollutants. |
| significant impacts during construction for nearby sensitive locations | √ | Long term heavy machinery and heavy construction traffic for ST15 to a) demolish the air strip b) build access roads c) build the development causing |

| | | |
|---|---|--|
| | | <p>harm from noise, lights, dust and debris to SINC and SSSI sites nearby as well as local businesses operating fishing ponds.</p> <p>Heavy carbon emitting plant to prepare OS10 as a wetlands nature reserve in place of a Higher level stewarded agricultural food producing area</p> |
| result in large, long-term construction sites that would generate large HGV flows | √ | please see above |
| requires an Environmental Impact Assessment | √ | Due to the ecologically sensitive nature of the area. |

As well as an exercise to predict likely air quality from the proposed strategic sites, the pre-existing air quality should be measured to monitor expected change given the sensitive nature of the area's ecology. Even if the predicted air quality is within permitted levels, it should be made clear how far it will be changed from the current high quality we enjoy, in order to ensure transparency about what will be lost.