

York Environment Forum (YEF) Response to the Inspector’s Revised Phase 2 MiQs

Matter 1 - Strategic Vision, Outcomes and Development Principles

Inspector’s Question	Our response	References
<p>1.1 Does the Strategic Vision, Outcomes and Development Principles set out within Section 2 and provided in policies DP1, DP2 and DP3 of the Plan provide a clear and appropriate framework for the strategic policies set out primarily within Sections 2 and 3 of the Plan?</p>	<p>No, it does not. Starting with the vision, the second section says “<i>The plan will ensure that the vision and outcomes are delivered in a sustainable way that recognises the challenges of climate change, protects residents from environmental impacts and promotes social, economic and cultural wellbeing.</i>”</p> <p>This is far too weak a statement and fails to match the expectations of the NPPF to actively manage these implications. It is especially inadequate in the face of the scale of the Climate and Bio-diversity emergencies which require rapid and significant action required (see our related comments regarding climate change in Matter 8).</p> <p>As we have argued in our two submissions SID 374 and SID 332, the current plan’s failure to assess and address alternative options to deal with the predicted massive traffic and congestion growth means the plan is not sustainable. Increased congestion will completely undermine some of the plan’s other important objectives such as making use of York Central and reinforcing the strength of the city centre in the prosperity for all section (paras 2.2 and 2.3). We suggest that the word “recognises” in the above extract from the Vision statement should be amended to “addresses”, add the words “and biosphere” before “from the environmental impacts” and replace “promotes” with “secures” in the final line. These amendments should then be reflected in changes to the spatial strategy, and development plan policies regarding housing and transport, etc., that we have argued for in our submissions.</p> <p>The vision and outcomes also seeks (para 2.5) to ‘provide good quality homes and opportunities’ to achieve a target of 867 dwellings a year’ [which] will include substantial areas of land for garden village development delivering exemplar new</p>	

	<p>sustainable communities at Land West of Wigginton Road (ST14), Land East of Metcalfe Lane (ST7) and Land West of Elvington Lane (ST15). . . . Policy DP3 sets out the ‘overarching development principles’. They include: ‘[to] ensure that social, cultural and community infrastructure of the new neighbourhoods are met through the provision of accessible facilities and services in a planned and phased manner which complements and integrates with existing facilities’. This all follows NPPF2012.</p> <p>We support the principle of garden village development. However, as we indicated in both our submission 332 and in section 6 of our submission 374 we believe that the quantum of development proposed for the strategic housing sites is too small to provide the necessary social, cultural, community and commercially viable public transport provision. Successful garden villages must be self-contained in terms of primary schools, basic shopping, recreational and community facilities, some employment, and good quality public transport and active travel links to major employment, shopping, health services and secondary schools.</p> <p>Particularly pertinent to what this means in scale terms was a York Civic Trust (YCT) sponsored workshop in March 2021 which included representation from York Environment Forum. It took a detailed look at the principles of sustainable communities and their application to York. It involved comprehensive research into current practice and literature published by expert bodies and academics (see list on right).</p> <p>Following the workshop, YCT published a report titled ‘Sustainable Communities’ (see https://yorkcivictrust.co.uk/sustainable-communities/), which presented a set of recommendations for the City to take forward. The report recommended that the development proposed in the Draft Local Plan, outside the central area of York, “should ideally be replaced by two new communities, each with a population in excess of 15,000, to ensure that the full range of community facilities and services can be sustained.” Their conclusion echoes, albeit in rather</p>	<p>Uxcester garden city, 2014 Wolfson Economic Prize, 2014. Garden Cities and Garden Towns: Visions and Reality, Transport for New Homes, 2020. Transport for New Homes : Project Report and Checklist, 2018. 20-Minute Neighbourhoods: Creating Healthier, Active,</p>
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	<p>more detail, our submission SID 332. The YCT report also recommended that such communities should be linked to the rest of the city by sustainable modes of travel and with maximum travel times. The new communities should comprise a range of tenure types and dwelling types built at mixed densities averaging around 50dpa.</p> <p>To illustrate this further we have looked at two key aspects, education provision and public transport. Looking at education provision first, York currently has 49 primary schools and 10 secondary schools in the public sector for its 208,000 population (one primary per 4,245, and one secondary per 20,800 population). Nationally there is roughly one primary school for every 3,300 population and one secondary school for every 16,350 population, i.e. school sizes of 281 and 986 pupils respectively, so York’s school sizes are already relatively high.</p> <p>If we adjust for whole class sizes for a small 210 One Form Entry (1 FE) primary school, this would match a population of 2,465 which equates to 1070 dwellings at a 2.3ppd ratio. A more typical and more economic 2 FE primary would match a 2140 dwelling settlement. A minimum 3FE secondary of 750 pupils requires a 12,430 population equating to 5,400 dwellings. A more typical 4FE secondary requires a 16,575 population which equates to 7,200 dwellings.</p> <p>Turning to public transport provision, the Chartered Institute of Highways & Transport’s 2018 “Buses in Urban Development” Document states in its key messages “New developments should be sufficiently compact or dense to generate demand that will support high frequency bus services with long-term viability”.</p> <p>Its advice on service levels includes:</p> <p>To attract a high mode share of trips, and to meet the sustainability objectives set out in planning policy, the aim should be to provide a service pattern with:</p>	<p>Prosperous Communities, TCPA, March 2021.</p> <p>20-Minute Neighbourhoods: Implementing 20-Minute Neighbourhoods in Planning Policy and Practice, RTPi Scotland, March 2021.</p> <p>CIHT - BUSES BROCHURE 2018_cs4.indd</p>
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	<ul style="list-style-type: none"> • 7-days-a-week service; • Early mornings and late evenings covered; <p>People also prefer timetabling and frequencies that offer:</p> <ul style="list-style-type: none"> • Frequency minimum every 20 minutes in urban areas, with 10 minutes the target, and 5–6 minutes the target for core routes and corridors. <p>It notes that a seven-day service may be seen as an onerous requirement, but without it, there is little chance of enabling people to live without a car. Moreover, travel demand has changed over the years, and there are now far more shops and other facilities open on Sundays.</p> <p>Examination of bus service provision to out of city settlements around York not built directly on major road corridors shows that in terms of being able to deliver high quality commercial bus services (15 minute daytime, 30 minute evenings and Sundays) only Haxby / Wigginton (population circa 12,000) and Strensall (population circa 6,000) meet this target in terms of a direct service to the centre of York. However only Haxby / Wigginton has a service to the two major out of town employment / retail / leisure sites at Clifton Moor and Monks Cross in their quadrant, and that is only a non-commercial Mon-Sat daytime hourly service.</p> <p>This reinforces the Civic Trust’s conclusion that a 15,000 target for a new community outside York, which could support a new secondary school as well as primaries, and a high quality commercial public transport offer is probably not far off the mark. At a density of 2.3 people per dwelling that suggests a settlement size of 6,500 homes., ST15, the largest, is only half this size.</p> <p>Even if the inspector is willing to accept only a case for a basic public transport connected small settlement, with just primary school provision, the evidence from the next two smaller settlements outside the main York urban area of Upper &</p>	
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	<p>This is the approach York should have been following. Oxford faces many of the same problems as York, and with the designation of a permanent green belt for York, we are likely to follow them in terms of their amplification over time. The new York Local Plan should recognise the appropriate policy responses, especially on having transport policies that put active travel and public transport first, coupled with demand management measures to keep traffic levels down to the road network's (as enhanced) free-flow capacity, and to ensure there are the housing densities, local facilities and services and non car based layouts that will facilitate that.</p> <p>We ask the inspector to also commend the Oxford Approach to the Council to take into account in the consequential work from amending the vision along the lines we have suggested above, and from the necessary further transport analysis and housing work we proposed in our previous submissions and touch on in later answers here.</p> <p>Finally issues of local food production and consumption are another key aspect of sustainability, which the plan needs to address, including picking them up as a role of the proposed green belt.</p>	<p>transport/connecting-oxfordshire/area-strategies</p>
<p>1.2 Are the Development Principles set out in the Plan justified, effective and in accordance with national policy?</p>	<p>No, they are not adequately justified, and the development policies are inadequate.</p> <p>As we indicated in our submissions, and in our response to question 1.1 above, sustainable development (SD) needs to be of mixed use, high density, designed around high quality walking areas and cycling routes, with those routes providing short, safe and convenient links to a core set of community facilities including schools, shops, leisure facilities and personal services. These principles need writing into policies DP2 & DP3 as fundamental requirements, rather than, as the current policies do, simply suggesting that they are desirable.</p> <p>For example, Policy DP2 ii) does mention schools, but not the other local facilities we list above that are necessary for any genuinely sustainable local community. Even in terms of the additional schools the growth of the city will require, no</p>	

	<p>allocations of land for primary or secondary education are made, even in the proposed new garden village communities.</p> <p>As part of the changes, as indicated in our submission SID 332, we want to see housing densification and the increase size of sites ST14 & ST15 or reversion to the previous larger ST15 Whinthorpe site (see page 39 on in the 2014 Publication draft Local Plan) to provide the critical mass of facilities including new primary school(s) and specific site allocations for this/these school(s) and the other required community facilities. See also our response to question 4.11 (d) regarding site thresholds</p>	<p>sd010a-city-of-york-local-plan-publication-draft-2014-</p>
<p>1.3 Is the overall strategic approach, in terms of the vision, outcomes and principles relating to development, its management and delivering the Plan’s development requirements positively prepared, justified, effective and consistent with the Framework?</p>	<p>No. The overall strategic approach has not been justified by the analysis which underpins the draft Local Plan. To be clear, we understand “justified” to mean “the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence“ (NPPF, 2012, para 182). Our concerns are with the location, density and scale of new development, the incompleteness of the design principles, the assessed transport implications of the development, and the failure to consider alternative strategies for mitigating those impacts. These are all issues on which we will comment in more detail under Matter 4.</p> <p>The location and scale of new development, as we have highlighted already, does not follow the sustainable development ambition, making a number of inadequately sized allocations that can only operate as car-based dormitories.</p> <p><u>Incomplete design principles for new developments</u></p> <p>The design principles for new developments again do not comprehensively or adequately detail what is required for sustainable low carbon, low car use development, which we have touched on in the previous answers, and pick up further in matters 4 & 8. The literature on sustainable development demonstrates that the following additional points are needed:</p>	

- development needs to be of mixed use and high density
- development should be designed around high quality walking and cycle routes
- those routes need to provide short, safe and convenient links to a core set of community facilities
- development needs to be designed to manage servicing traffic and to accommodate appropriate emerging technologies.

We recommend that all of these are added to Policy DP3 so that they can be addressed in more detail later in the Plan.

The objectives against which the transport assessments are made

Para 2.16 of the draft Local Plan sets out the transport-related objectives which any assessment should consider. As we noted in our submission in 2018, this list is somewhat incomplete. In particular, it says nothing about accessibility, or equitable provision of access. Neither does it mention climate change, which the Government now expects to be central to any Transport Plan. We recommend that these are included in this paragraph and addressed in the assessment.

The options considered in the transport assessments

Para 2.16 specifically states that the Plan will ensure that ... “growth will not have unacceptable impacts in terms of congestion and air quality ...”. Policies DP1, 2 and 3 all refer in different ways to the need to deliver a fundamental shift in travel to more sustainable modes, albeit not sufficiently robustly, as already indicated. Policy DP3 refers specifically to minimising “the environmental impact of vehicle trips to and from the development”. We strongly support all these aspirations. Yet the only analysis of these potential impacts comes in the Transport Topic Paper,

	<p>which simply predicts the impacts of new development on the road network on the assumption of no remedial measures. Its prediction of a 55% increase in congestion as a result is clearly not evidence of growth which “will not have unacceptable impacts in terms of congestion”.</p> <p>In practice the analysis in the Transport Topic Paper is flawed because it takes no account of any demand response to such delays. It also fails to satisfy the Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) that any such assessment should:</p> <ul style="list-style-type: none">· assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms· assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport· highlight and promote opportunities to reduce the need for travel where appropriate· identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate. <p>Our concern is that, had the Council carried out such an assessment of remedial measures it would have been able to demonstrate that a pattern of development could be achieved which would, in the words of para 17 of the 2012 NPPF, “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.</p> <p>We would therefore ask that the Inspectors accept that, in this regard, the draft Local Plan is as yet not justified, and ask the Council to carry out the necessary further analysis and consequential amendment, etc., before we proceed further.</p>	
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<p>1.4 Has the Plan been informed by an adequate process of Sustainability Appraisal and Habitats Regulations Assessment in this regard?</p>	<p>No. It seems clear from the inadequacies of the sustainability aspects of the plan (which we have identified in our submissions and in other comments here), that it has been carried out in name only – there is no evidence it has led to any meaningful change in the plan.</p>	
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