

## **York Bus Forum: Matter 6 Hearing**

### **Comments on Public Transport following issue of EX/CYC/79**

Q 6.1 In the Matter 4 hearing, CYC stressed that high quality public transport would be essential for all strategic sites. We agree, but these are not specified in EX/CYC/70 (which we assume supersedes the Infrastructure Delivery Plan (IDP) list of schemes) and it is unclear how they will be delivered. The only information provided in respect of the new developments is “Bus enhancements, including as specified in Local Plan policies, new/increased frequency services”. At the Matter 6 hearing on 24<sup>th</sup> May, we were advised that EX/CYC/79 (Appendix 1) provided an update to the schemes list. However, this document (ref 2.40 page 21) contains the same wording as before.

As we argued in our original submission, a wider series of bus priority and bus infrastructure measures to offset the traffic and congestion growth, and provide a high quality Citywide bus network is required if a significant mode shift to public transport is to be achieved. Many of the bus priority measures listed in the current development control 2005 Local Plan that have not yet been delivered should also be included in this plan.

Q 6.2 There is no evidence that the Plan will deliver the requirements for high quality public transport needed to support the level of growth proposed and, in particular to mitigate the predicted 35 or 65% increase in congestion. There is no analysis of what is needed to mitigate this increase in congestion, as should have been done in line with the DfT 2015 guidance on the Transport Evidence Base for Local Plans..

Q 6.4 .The only indication of the cost of these measures (which could be significant if it involves fast, segregated bus routes) is for an indicative cost totalling £3.5m for “bus enhancement” to serve sites ST7, ST14 and ST 15. There is no committed sum for these enhancements, which all rely solely on developer contributions. The size of the Council’s recent Bus Service Improvement Plan suggests what is required will be at far

higher cost, and it doesn't clearly cover all the previous 2005 Local Plan schemes we refer to earlier.

Q 6.5 The evidence base includes the Sustainability Appraisal, which is unsound because it gives the same score for transport impact to a development site irrespective of the number of dwelling units. This clearly gives no basis for assessing the impacts on different sites of congestion, on levels of travel or on modal choice. It thus fails to support the site allocations or to demonstrate that they are viable and deliverable. The sustainability appraisal is also unsound because it fails to address the cumulative impacts of the proposed new development and their mitigation.