

York Environment Forum response to Document Ex/CYC/079

Having briefly gone through the document, our biggest concern remains around the transport measures. Without the up-to-date analyses of the projected all mode transport impacts of both the proposed developments, and of the proposed mitigation measures, we are in the dark as to whether the proposed measures are effective in avoiding the current projections in the 2019 Transport Topic paper of major increases in traffic movements and the completely unacceptable 65% increase in weekday peak hour traffic delays, nor of the associated impacts on air quality and carbon emissions against the Climate Act and Carbon budgets for the Local Plan period. These analyses need to be completed, reviewed and if found wanting - as we strongly suspect they will be – spatial distribution and allocations reviewed, additional transport measures identified and included in an updated proposed IDP. Therefore, these issues can only satisfactorily be done and concluded in phase 4 of the enquiry at best given the dates the Council has indicated for these two sets of transport analyses to be produced, and assuming the analyses are fully compliant with the DfT's 2015 guidance., and that there will be a revised sustainability appraisal that addresses the serious shortcomings we and others have flagged with the current SA version.

Public Transport Related Aspects

Looking at the specifics on public transport, there is some uncertainty in the paper regarding a possible grade separated public transport link across the A1037 to the ST14 development. This is referred to in table 1 but there does not seem to be an allocation in Appendix 1. It also refers to an overbridge (also for active travel). This would potentially need to be quite high with long approaches and land takes and we wonder if the previously suggested walking and cycling subway (made large enough for single decker buses might not be a more practicable and less intrusive solution here, and which would allow the most direct run on bus link from the key employment / retail / leisure facilities at Clifton Moor.

A similar concern applies regarding the previously proposed public transport link across the A64 to the ST15 development. This isn't listed in Table 1 or Appendix 1 but is mentioned in para 25 third bullet point. We see the dedicated bus route as key to delivering the fast high quality reliable public transport link to site ST15, avoiding congested all traffic routes. This is essential to have any serious chance of getting motorists out of their cars onto the bus,

and avoiding the additional traffic impacts and delays on the already overloaded Hull Road and Fulford Road corridors. It will also be particularly important in the early phases of site development when developing the bus habit will be crucial to high longer term high bus patronage, low car usage.

The omission of these key public transport links, presumably for cost reasons, and of many other bus priority schemes included in the current 2005 development control version of the plan that we referred to in our original transport submission, our phase 2 written submissions on matters 1 & 4 and at the hearings, underlines our concerns at the council's failure to properly evaluate what's required to make new communities sustainable, minimum development size to deliver commercially viable 7 day a week high quality public transport services. We would reiterate our ask of the inspectors to seriously consider recommending to the Council restoring, if not increasing further (including through post plan period site safe-guarding), the full previous ST14 & 15 site sizes to ensure we can both deliver the appropriate capital investments and high quality public transport services that are required, and ensuring that both sites have dedicated bus links definitely included in the IDP. Enlargement of the ST15 site could also help deliver the size required to ensure the on-site provision of a secondary school which Table 1 currently only lists as a possibility, plus some local shopping and employment to make it more sustainable.

We also note that there doesn't appear to be any allocation for measures at the A64 Fulford Road intersection where capacity issues have been flagged in the recent CoYC statement of common understanding with National Highways. In particular, we would want to ensure that there are adequate bus priorities through this junction provided to ensure the important A19 Selby Arriva and Naburn Park and Ride services can run through it without delays and then into town given the major negative impacts congestion on Fulford Road already has on the existing bus services.

Additionally, we note the Council's reference in para 25 to the York Central site, where its decision to resile on the previous plan commitment to not providing any through route to the city centre for general traffic now means the vaunted through site bus services serving York Central will now be subject to significant peak hour delays getting through the Leeman road (Marble Arch) tunnel, which will adversely affect bus reliability and use. The additional through traffic will also negatively impact the Lendal gyratory on the Inner Ring Road through which the overwhelming majority of all York's local and many of

its longer distance bus services pass, with consequent wider negative impacts on bus service journey times and reliability. This decision should be revisited as part of the phase 4 transport mitigation examination.

All these issues flag the wider point that the Council needs to be asked to demonstrate in its promised additional transport modelling work what the predicted impacts of the increased traffic from local plan development will be on bus journey times and reliability, not just cars. This is not as simple as simply looking at peak hour general journey times. Delays have knock on consequences after the peaks for bus services, and as traffic and congestion has grown and spread beyond just the peak hour over the years this has had a multiplier effect on disruption to bus services, negative perceptions of bus travel, and inability to attract car drivers to switch. The further increase in traffic and delay over the plan period could easily undermine the Council's plan aspirations for higher bus usage.

Active Travel Related Aspects

On the Active travel side, we note the continuing utter inadequacy of the proposed allocations, particularly for upgrading the existing cycling network against a backdrop of a significant decline in cycling since 2014 and the Council's Mr. Ridge's acknowledgement during the phase 2 matter 4 hearing that the existing network was both generally sub-standard and that it would need heavy investment to rectify (the easy bits having already been done). The quality of the network and use of segregation from traffic on busier roads as per the DfT's LTN1/20 guidance note is crucial. Until comprehensive and complete LTN1/20 compliant routes are delivered, we will not see the scale of modal shift that the existing proposed plan requires, let alone the higher levels that we expect the promised transport analyses will demonstrate are really required to meet the plan's objective of not increasing congestion. People do not make their judgements about the safety of travelling by bike, or their decisions to cycle or not on the basis of the good bits of cycling routes, but on the more difficult sections. The existing cycling network in York has too many missing bits and sub-standard sections to have really wide appeal. Simply providing high quality cycling (and walking) links to new development sites will not work for journeys to and from them if they feed into an unacceptable existing network.

Please also see our previous Phase 2 written submission highlighting the recent experience on the Tadcaster road scheme which gives strong pointers to the real order of costs for delivering LTN1/20 compliant schemes.

We also note that figures 5 & 6 only appear to show the off road cycling network besides (the lines are hard to see). A cycling network needs to comprehensively and generally directly link residential areas to all key destinations and therefore needs to include a comprehensive set of radial cross linking routes too – there are none to several key employment (retail and leisure) sites (e.g. Monks Cross, Poppleton and White Rose Business parks, etc.) shown in these figures. This reinforces the fact that the proposed key cycling network is inadequate as we highlighted in our original and phase 2 written submissions – we’d again draw the inspectors’ attention to the more robust network shown on the large scale proposed plans for the city in the 2005 development control version of the plan – this should be incorporated in the new plan.

The Council should be asked to re-address all the above issues and bring forward robust increased allocations in its proposed new IDP.

Educational Facility Related Aspects

In the education section there are various references to new schools or school extensions being within reasonable distance of developments. “Reasonable” needs defining relative to pupil ages, and the distances children will be able to walk in particular, so robust sustainable age appropriate solution in travel terms and development size for the new communities can be delivered. We are concerned that para 40 suggests that the plan could end up with providing places in schools remote from and beyond likely walking and cycling distance from some developments, which would be unacceptable at pre-secondary level and highly undesirable even at secondary. See also our earlier point about ST15 being big enough to be able to deliver a local secondary school to avoid this problem.

Annual Reporting

Under next steps, para 42, we welcome the Council’s commitment to at least an annual reporting programme. This should be formally incorporated in the plan itself (in an appropriate policy commitment).

D.M. Merrett

For York Environment Forum

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