

## York Labour Party (YLP) Phase 3 MIQ Response

### Matter 1: Affordable Housing

Inspector's Question	Our response	References
<p>1.1 What is the need for affordable housing?</p>	<p>The proposed local plan affordability evidence base is GL Hearn's June 2016 Strategic Housing Market Assessment report. This indicated that 573 additional households a year would need support with housing based on 2014/5 year data for house prices and rent levels. This affordable need represented 69% of the overall housing need. The June 2016 update report incorporating the 2014 SNPP upped the 573 figure to 627. There was no further review of the affordable housing aspect in Hearn's subsequent May 2017 pre-submission update. However Hearn's reverted to referencing the 573 figure (with no explanation as to why), as does the Council's Dec 2019 phase 1 written submission and its Feb 2020 Affordable Housing supply note. The two other post-submission SHMA updates from Hearn's (dated January 2019 and September 2020) do not update the affordable housing need assessment and deliverability threshold information either. The Council is therefore relying on a superseded six-year-old analysis of affordable housing need and site provision thresholds using 7-8 year old data. This is surely inappropriate, given the evidence we put forward at the phase 1 and 2 hearings on the continuing significant worsening of both house price and rent affordability in York (see our phase 2 matter 2 submission for the latest statistics – link to right), which is likely to mean these numbers &amp; the housing support percentage will need upping significantly.</p> <p>There is also further anecdotal evidence on the consequence of what has been going on and lack of affordable and new family housing for the local market in the recently published 2021 census data when compared with the preceding 2011 data. This shows a significant absolute decline in the under 15 child population (focused on the 0-4s) in the city (-900 rounded off) compared to a national increase, with York's under 15 population representing only 14.2% of the total against a Wales &amp; England average of 17.4%. The 25-34 post university year</p>	<p>Q SD051</p> <p>SD052</p> <p>SD050</p> <p>Ex/CYC/36, Ex/HS/M2/HR/0</p> <p>Ex/CYC/14a and/43A</p> <p><a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a></p> <p><a href="#">How the population changed in York, Census 2021 - ONS</a></p>

	<p>group has grown less than the national and the 40-49 age group, the primary family raising age groups, has also seen a rather more significant absolute decline relative to the national picture.</p>	
<p>1.2 Does the provision for affordable housing in the Plan properly and pragmatically reflect that need?</p>	<p>No, it does not.</p> <p>Hearn’s original SHMA also referencing a then (2016) potentially achievable 25-40% affordable housing ratio for new developments, with actual typical ratios of 20-30%. The Council chose to set a 20% brownfield, 30% greenfield target for larger sites producing r 15 dwellings and above in its draft plan. Unless we have missed something, we do not see clear evidence or justification for the Council choosing these low threshold figures, given the major affordable housing need shown in the SHMA (leave aside post 2016 issues), and believe the Council should be asked to explain their rationale for their original choice, and failure to update it subsequently. For comparison Cambridge sets a 40% affordable target on all sites of 15 units and above, Oxford 50% for 10 units and above. Oxford also specify 40% must be in the form of socially rentable.</p> <p>In our original 2018 submission (section B, sub-section 4.1), we argued these large site thresholds were inadequate and proposed a compromise 25% brownfield / 35% greenfield pair of thresholds for 15 properties and over (to still allow some flexibility). The evidence given in the previous phase 2 hearings on Matter 6 that the current developer obligations could be met on all sites bar the largest new settlements suggests that our proposed increased thresholds should definitely be possible for most sites, as we have confirmed in recent discussions with some developers / agents, and the couple of exceptions can be dealt with under the exceptions provision in the proposed policy. Even that scenario might become unnecessary if the Council chose to reinstate the original larger new settlement site allocations which they arbitrarily reduced in the submission version of the plan (please see also our further comments on the new settlement allocation size and viability issues in matters 4 &amp; 7). We would ask the Inspectors to push this course of action both to increase the affordable housing supply but also for the other reasons we and other like the York Civic Trust and York</p>	<p>SD051 Para 6.97</p> <p>SID 364</p> <p>HS/P2/M1/SV/16 &amp; HS/P2/M4/SS/21</p>

	<p>Environment Forum have put forward regarding minimum size thresholds for more sustainable new settlements in our earlier submissions, and particularly in phase 2 Matters 1 &amp; 4.</p> <p>We would also reinforce our point in those submissions about the need to achieve settlement sizes which produce a good range of local services and high quality 7 day a week bus service links to the city / main employment areas. In recent discussions with one of the local RSLs (Registered Social Landlords) we were made aware of the problems RSLs have in letting out of urban area properties in smaller settlements with poor public transport links, and the social isolation it can lead to for their occupants. Potential tenants are reluctant to accept such properties because of the difficulties accessing jobs, services and friends. Given the plan's reliance on these larger new settlements for a substantial proportion of its future affordable housing supply, it is crucial that we don't end up with provision that doesn't work for its anticipated users / the RSLs.</p> <p>In conclusion, we consider the policy, amended as suggested, is essential to help address the extreme housing affordability gap in York, which we have outlined in our original 2018, 2019 submissions and most comprehensively with up to date data in our written submission on matter 2, questions 2.2b) 2.3 and 2.5 at the phase 2 hearings, and we would particularly draw the Inspectors attention to our answers there.</p>	
<p>1.3 Should the housing requirement be uplifted to reflect the need for affordable housing?</p>	<p>Yes. Since a range of need both for affordable and intermediate housing is required and the position further exacerbated since submission, as we have previously covered.</p>	
<p>1.4 What would be the effect of such an uplift?</p>	<p>The effect would be to reduce the very large shortfall in affordable housing supply. From discussions with developers / agents, we do not believe the extra 5% on the two main thresholds would deter proposed developments coming forward, subject to the Council fairly operating the exception route for the small number of large new settlement sites as necessary.</p>	

<p>1.5 Is Policy H10 soundly based?</p>	<p>No, as we have touched on in the preceding responses, the key brownfield and greenfield affordable housing thresholds had been set too low against the G.L Hearn estimate of a potentially achievable 25-40% and the very high need for affordable housing in York. We consider a more ambitious policy is essential to help to address the extreme housing affordability gap in York, which we have outlined in our original 2018, 2019 submissions and most comprehensively with up to date data, in our written submission on matter 2 , questions 2.2b) 2.3 and 2.5 at the phase 2 hearings, and we would particularly draw the Inspectors attention to our answers there.</p>	<p>SID 364</p> <p><a href="https://www.york.gov.uk/downloads/file/3696/ex-hs-m2-hr-23-ylp-ylg">https://www.york.gov.uk/downloads/file/3696/ex-hs-m2-hr-23-ylp-ylg</a></p> <p><a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a></p>
<p>1.6 Is the approach to OSFC a reasonable one?</p>	<p>No. The current policy, in as far as it exempts purpose-built student accommodation (PBSA) from providing a current affordable housing contribution (i.e. a contribution is only applied if the student use subsequently ceases) together with the fact that no education contribution is applicable has been having the effect of pricing out bids based on the provision of ordinary local housing provision of city brownfield sites, which require both. We identified this in our previous submission, see our written response to the phase 2 MiQ questions 5.2 &amp; 5.4 and we have more recently confirmed this remains the position in recent discussions with local developers / agents. We would also refer you to the precedent of Oxford’s Local Plan – Policy H2 section b) on this.</p>	<p><a href="#">HS/P2/M5/HLS/15</a></p> <p><a href="#">OCC Oxford 2036 Adopted single pages (3).pdf</a></p>
<p>1.7 Will the alternative source of supply (in policy GB4) make any material difference?</p>	<p>This policy, which we are supportive of, is allowed under the NPPF as being for “limited affordable housing for local community needs” and is therefore by definition only likely, if exercised, to provide small numbers. The fact that it has not been exercised much nationally as we understand it, tends to confirm that’s its contribution will be marginal.</p>	

### **Matter 3: Student Housing**

Inspector’s Question	Our response	References
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<p>3.1 What is the need for student housing?</p>	<p>We identified the very serious underestimate of future student numbers in Hearn’s 2016 SHMA in our phase 2 written submission answer to question 2.3. We refer the Inspector’s to that information, which included some estimate of the further short term increase expected. However, it is important that we get some definitive answers from the higher education institutions for the whole remaining plan period. Given what has happened and the further massive negative impact the unanticipated expansions in student numbers has had on the local housing market, we consider it is crucial that a policy requirement is added in the plan for annually monitoring the actual changes in student numbers and the amount of on and off site, institutional and private, dedicated student accommodation, together with a plan mechanism for addressing any future significant mismatches between actual and planned student numbers, and provision.</p>	<p><a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a></p>
<p>3.2 Is the general approach of the Plan to student housing justified?</p>	<p>No. The evidence base is out of date and demonstrably now incorrect. There is an inadequate monitoring requirement, and no mechanism for responding to changes in actual numbers as we have indicated above. The Universities have not been held to the requirement for additional on campus accommodation, but we recognise a more flexible approach to on site provision will be required to allow that (but still preserving the parkland setting character in the case of the University of York’s two campuses, including the proposed east campus extension).</p>	
<p>3.3 Is Policy H7 reasonable?</p>	<p>Yes – we strongly support its aim, and consider it is justified given the demonstrably major impacts the universities expansion have had on the local housing market as we have evidenced in our previous submissions. However, the current policy needs strengthening in the light of the major unexpected expansion of the main universities since 2014 without them having met the policies aim. Perhaps there should be a policy restriction on the further expansion of student numbers / teaching facilities without the submission of plans demonstrating how the resulting accommodation needs should be delivered and funded.</p>	

3.4 Will it adequately address the need for student housing?	Yes - if strengthened as above and then adhered to.	
3.5 Is allocation SH1 soundly based and sufficient?		
3.6 Is the manner in which Policy H8 approaches HMOs justified?	We consider it is. The policy was extensively consulted on prior to introduction and helps to ensure local communities and the facilities that support them do not die, as has happened in some University locations (e.g. Headingley in Leeds), and that sustainable all year round balanced communities are preserved. More widely, it also has also helped limit the impact of the university's expansion on the local housing market, and levered investment in building new student accommodation.	

#### **Matter 4: Strategic Sites**

<b>Inspector's Question</b>	<b>Our response</b>	<b>References</b>
4.1 Is the allocation and associated Policy SS4 relating to ST5 soundly based?	<p>We wish to protect the upper end employment allocation, and to reiterate the points we made in our previous submissions about offering a wide flexible range of employment spaces and addressing the severe imbalance in job opportunities in the City. The employment benefits of this incredibly well located site relative to the station and the national rail network, with the major opportunities that offers for improving York's economic base, including to deliver a site for the great British Rail HQ and a new Rail Academy in the city to address the known and projected specialist staff shortages in the rail industry, must be protected.</p> <p>We would also reiterate our concerns about the excessive housing target for the site, which will result in it failing to address local housing needs because of</p>	<p>SID 364, PM SID 364,  <a href="#">HS/P2/M3/ED/7</a></p>

	<p>price, the wrong mix of accommodation types, limited affordable housing and the latter being too much of the wrong form to meet the predominant social rent need identified in the 2016 SHMA.</p> <p>Finally we would reiterate our support for a far more sustainable design for this central site in transport terms, based on a stronger set of design principles and strengthened transport policies as outlined in our previous submissions.</p> <p>Otherwise we are generally supportive of policy SS4 and its principles and strongly support them as the right framework for the sites development.</p> <p>In support of this approach we note, as has inevitably happened as a consequence of the excessive housing target, that the approved outline application (18/01884/OUTM) and Reserved Matter Application Phase 1 Infrastructure (20/00710/REMM) contains little provision for social and communal infrastructure. In particular, there is an absence of health and education facilities for the site. Many facilities in the surrounding areas are already inadequate and overloaded. The applications Environment Statement (Vol. 4 Non-Technical Summary, 6.14) acknowledges that the development ‘will put further demands on social infrastructure, including health and social care facilities, unless more is provided within or close to the Site’ and ‘[p]otentially moderate adverse effects could occur upon education provision’ (Vol.4 Non-Technical Summary, 6.8).</p> <p>We further note that the Council’s very recently submitted documents CYC/87 and 87a present the results of the Council’s assessment of the impacts of the Local Plan developments on the highway network, using the Council’s new strategic model. We have not had time to fully digest these two documents but note that the York Civic Trust have provided a fuller assessment of these</p>	
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	<p>documents in the annex to their submission, and an outline of the implications for ST5 in their main submission, which we would draw the Inspector’s attention to. They highlight the unacceptable traffic and congestion implications of the approved form of development, with excessive parking including two new multi-story car parks, and a new through road - against the aims of Policy T1 to discourage traffic and the NPFs overarching aim of delivering sustainable development. We would like to see the need to restrict or remove through traffic and a lower parking ceiling explicitly incorporated into the principles in Policy SS4.</p> <p>We also note that York Civic Trust strongly believes that the environmental assessment for York Central is based on unsound information and analysis and support their call for it to be reassessed to examine the impact of York Central on completion in 2033.</p> <p>In conclusion, we would wish to see the Council working with the site development partners to address these concerns through an evolution of the existing proposals so as to address the major shortcomings of the existing outline approval. The retention of a strengthened local plan policy would provide the right framework for this.</p>	
4.2 Is the allocation and associated Policy SS6 relating to ST1 soundly based?		
4.3 Is the allocation and associated Policy SS7 relating to ST2 soundly based?		
4.4 Is the allocation and associated Policy SS8		

relating to ST4 soundly based?		
4.5 Is the allocation and associated Policy SS15 relating to ST17 soundly based?		
4.6 Is the allocation and associated Policy SS17 relating to ST32 soundly based?		
4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?	<p>Strategic site ST7 is one of three free-standing development sites on which we expressed our concern, in the Phase 2 hearings, that they are too small to support the services needed to establish an effective community or to result in patterns of sustainable travel and activity.</p> <p>Policy SS9 does not create the grounds for ST7 to be a sustainable community due to its size (845 dwellings on 34 hectares with a gross density of 25 dph); its separation from the existing urban fabric; its lack of a connection to the development of Derwenthorpe; and the resulting lack of any advantageous direct public transport links.</p> <p>When compared with the initial proposal (2013 Proposal Map) ST7 has been reduced in size and detached from the surrounding urban area so that it no longer provides the basis for the development of a sustainable community. The reduction to 845 dwellings, or around 2000 inhabitants, would place it well below the lower threshold for a garden village (DEFRA, 2018). SS9 Para iii [statement on infeasibility of providing a shopping centre?]</p> <p>SS9 Para iv requires the delivery of 'education and community provision early in the scheme's phasing, in order to allow the establishment of a new</p>	

	<p>sustainable community. A new primary facility and secondary provision (potentially in combination with Site ST8 – North of Monks Cross) may be required to serve the development as there is limited capacity available in existing schools.’ In our view such provision cannot be accommodated within the existing allocation of ST7 and maintain the ‘garden village’ character due to the size of the development. This would lead to any new facility being provided away from the development, increasing the number of car journeys to and from the development.</p> <p>SS9 Para v, which concerns impacts on the highways network, requires that the ‘impacts of the site individually and cumulatively with sites ST8, ST9, ST14 and ST15 should be addressed’. As noted earlier, documents CYC/87 and 87a present the results of the Council’s assessment of the impacts of the Local Plan developments on the highway network, using the Council’s new strategic model. We have not had time to fully digest the contents but note that the York Civic Trust have provided a fuller assessment of these documents in the annex to their submission, and an outline of the implications for ST7 in their main submission, which we would draw the Inspector’s attention to. This suggests that traffic mitigation measures will be needed throughout the Hull Road corridor, including for ST7, as a result. We await the Council’s assessment of such measures in time for Phase 4 of the hearings.</p>	
<p>4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?</p>		
<p>4.9 Is the allocation and associated Policy SS10 relating to ST8 soundly based?</p>		

4.10 Are the Green Belt boundaries of the ST8 site reasonably derived?		
4.11 Is the allocation and associated Policy SS11 relating to ST9 soundly based?		
4.12 Are the Green Belt boundaries of the ST9 site reasonably derived?		
4.13 Is the allocation and associated Policy SS12 relating to ST14 soundly based?	<p>In our previous submissions we made the case in our answers to Phase 2 Questions 1.2, 1.3 and 4.2 for a minimum size of the new settlements in the Plan, to ensure that the community can support the services which it needs and be relatively self-sustainable. We referenced the York Civic Trust’s work suggesting a minimum population of 15,000 which equates to 6500 dwellings (Sustainable Communities Workshop, YCT, 2021). We evidenced in our phase 2 written submission above that a population of at least 12,000 is needed to support a free-standing commercial bus service, a surgery and a secondary school.</p> <p>ST14, the second largest development / new settlement in the plan, falls well short of this proposed development minimum. Indeed, even when fully constructed, its population of around 3,100 would still be below the lower threshold for a garden village (DEFRA, 2018). The allocation relating to ST14 has been reduced considerably from the initial proposal set out on 2013 proposals map. The scale of the 2013 proposal of 4000 homes is closer to York Civic Trust’s recommendation and we strongly recommend that the allocation is increased to at least this level, and to address the need for adequate space for a full range of local facilities.</p>	<a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a>

We further note that the Council's very recently submitted documents CYC/87 and 87a present the results of the Council's assessment of the impacts of the Local Plan developments on the highway network, using the Council's new strategic model. We have not had time to fully digest these two documents but note that the York Civic Trust have provided a fuller assessment of these documents in the annex to their submission, and an outline of the implications for ST14 in their main submission, which we would draw the Inspector's attention to. We note the Trust's conclusion that the dualling of the Outer Ring Road (including south of this site) "is insufficient to counter the impacts of the new developments proposed in the Plan, and that mitigation measures will be needed". The Trust is also concerned that the current proposals fail to address the requirement 'to protect public transport journey times on junction approaches'. Moreover, no attempt has been made to conduct the promised investigation of 'grade separated, dedicated public transport routes across the A1237' and the opportunity will be lost once the outer ring road is upgraded. The Trust sees little point in including such commitments in the draft Local Plan if they are not acted upon, and we wholly concur.

The Trust also point out that the only current proposal is to extend the tortuous Route #6 to service the development, and to make use of the Route #40, which offers an hourly service on Wigginton Road. Neither service bears any resemblance to the 'high quality, frequent' service which is promised in the Plan, and they offer no realistic potential of achieving anything close to the Principle IX 15% public transport mode share envisaged. York Labour Party referred to the potential of reinstating the Council's previously proposed new park and ride facility immediately south-west of the A1237/Wigginton Road junction, with high frequency electric buses running on from there via Clifton Moor and the new cross ring road PT facility to the new development. This would also provide a hub for other communities in the vicinity, offer a more

	<p>appropriate starting point for the Hospital’s recently introduced park and ride service, and alleviate pressure from the existing Rawcliffe park and ride facility.</p> <p>A much larger site, as we have consistently suggested for sustainability reasons but also to address the inadequate housing provision in the current plan, would be more able to afford to deliver the Principle VIII &amp; IX proposals to include infrastructure to protect public transport journey times on the upgraded ORR junction approaches, the opportunity to provide grade separated, dedicated public transport (and active travel) routes across the A1237, and to secure the additional Park and Ride site and run on. The proposals for the outer ring road upgrade are now well advanced, and subject to an imminent planning application. York Labour Party supports this upgrade, but only on the basis that it is delivered with accompanying measures to reduce the amount of traffic within the ring road. A strengthening of the requirements for these sustainable transport modes in this policy as outlined would be crucial to delivering a sustainable development here.</p>	
<p>4.14 Are the Green Belt boundaries of the ST14 site reasonably derived?</p>		
<p>4.15 Is the allocation and associated Policy SS14 relating to ST16 soundly based?</p>		
<p>4.16 Are the Green Belt boundaries of the ST16 site reasonably derived?</p>		
<p>4.17 Is the allocation and associated Policy SS16</p>		

relating to ST31 soundly based?		
4.18 Are the Green Belt boundaries of the ST31 site reasonably derived?		
4.19 Is the allocation and associated Policy SS18 relating to ST33 soundly based?		
4.20 Are the Green Belt boundaries of the ST33 site reasonably derived?		
4.21 Is the allocation and associated Policy SS20 relating to ST36 soundly based?		
4.22 Are the Green Belt boundaries of the ST36 site reasonably derived?		

### **Matter 7: Land West of Elvington Lane**

<b>Inspector's Question</b>	<b>Our response</b>	<b>References</b>
7.1 Is the allocation and associated Policy SS13 relating to ST15 soundly based?	In our previous submissions we made the case in our answers to Phase 2 Questions 1.2, 1.3 and 4.2 for a minimum size of the new settlements in the Plan, to ensure that the community can support the services which it needs and be relatively self-sustainable. We referenced the York Civic Trust's work suggesting a minimum population of 15,000 which equates to 6500 dwellings (Sustainable Communities Workshop, YCT, 2021). We evidenced in our phase 2 written submission above that a population of at least 12,000 is needed to support a free-standing commercial bus service, a surgery and a secondary school, and	<a href="https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party">https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</a>

	<p>additionally in regard to affordable housing provision in our comments on matter 1.2 earlier.</p> <p>ST15, the largest development / new settlement in the plan, also falls short of this proposed development minimum. The allocation relating to ST15 has been moved and reduced considerably in size from the initial proposal set out in the 2013 proposals map. In that proposals map, ST15 was bounded by the A64 thus creating a development with significantly smaller infrastructure costs, and one physically close with easy potential links to the University of York's East Campus and proposed extension for which it could have readily helped address accommodation and spin out employment space shortfalls that couldn't be met on the restricted two campus sites. The reduction of the size of the development and its added distancing from the main urban area and the A64 makes it much harder to provide for and achieve sustainable travel. Any walking is unlikely, and even cycling will probably be minimal.</p> <p>Principle IX – Policy SS 13 Principle IX requires an 'appropriate range of shops, services and facilities including social infrastructure such as health, social, leisure, cultural and community uses to meet the needs of future residents, made early in the scheme's phasing in order to allow the establishment of a new sustainable community', with such facilities provided in a new local centre. We do not think that the population of 5000 to be achieved during the Plan period will be sufficient to sustain such provisions. A local GP surgery is highly unlikely. We would prefer to see this resolved by significantly increasing the planned housing provision, (and hence population). Failing that it will be necessary to impose strict enforcement to ensure that these facilities are provided and sustained.</p> <p>Principle X – Policy SS 13 Principle X commits to 'new on-site education provision to meet nursery, primary and potentially secondary demand'. We support this, but question whether it is feasible to provide for secondary education on site. The evidence we submitted on phase 2 Matters 1 &amp; 4 suggests that a minimum population of 12,000 is needed to justify even a three form entry</p>	
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	<p>secondary school. Without such provision, the nearest secondary schools are at least two miles from the site and will result in significant car traffic to access them. Experience with Dunnington, at a similar distance from the city centre, and where parents have to act as voluntary marshals for pupils travelling by bicycle, illustrates the unacceptability of such provision.</p> <p>We further note that the Council's very recently submitted documents CYC/87 and 87a present the results of the Council's assessment of the impacts of the Local Plan developments on the highway network, using the Council's new strategic model. We have not had time to fully digest these two documents but note that the York Civic Trust have provided a fuller assessment of these documents in the annex to their submission, and an outline of the implications for ST14 in their main submission, which we would draw the Inspector's attention to. We note the Trust's statement that they understand that the tests of the three alternative arrangements for accessing ST15 demonstrated clearly that accesses would be needed both directly through a new grade separated junction on the A64 and indirectly through an access to Elvington Lane. With both of these in place, travel times on the A64 are predicted to rise by around 5% between 2019 and 2033, suggesting that this provision is sufficient to cater for the vehicular traffic generated. The expansion of the site to 4000 dwellings by 2040 has little further impact. However, these provisions are very expensive; the total cost of road access to the site is shown in CYC/79 as £68m, and this does not appear to meet all National Highways concerned as evidenced in the Statement of Common Ground with the Council submitted during the Phase 2 hearings. It will be extremely important, therefore, to assess whether these costs can be reduced, and current travel times on the A64 broadly maintained, by introducing mitigating measures. These should include providing services on site to reduce journey lengths, promoting active travel for links to the university and the city centre, and providing the high quality public transport which is proposed, but has not yet been tested. We are particularly concerned that, if developers are faced with a significant cost for highway provision, they will be more reluctant to provide financial support for such services or for other crucial elements such as</p>	
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	<p>affordable housing. We encourage the Inspectors to return to this question in Phase 4, and to ask the Council to conduct the necessary analyses in advance (see also our response to 7.4).</p> <p>Principle XII – Policy SS 13 Principle XII specifies ‘provision of necessary transport infrastructure to access the site with primary access via the A64 (as shown on the proposals map) and a potential secondary access via Elvington Lane.’ We note that, in its latest analysis, the Council concludes that both of these accesses will be required to support access by motorised vehicles. In CYC/79 the Council proposes allocating £68m to these links and improvements at Grimston Bar. It only allocates £2m to public transport access and £4m to access by active modes. We very much doubt that a development with so small a population can justify such a high level of committed expenditure by developers. But we are also concerned that it implies a dominant emphasis on access by car, and access to the wider road network rather than to the city of York. This is likely, from experience elsewhere, to lead to the creation of a dormitory village, with commuters destined for other employment centres, such as Leeds, which will add little to the development of York as a sustainable city.</p> <p>Principle XVI – Policy SS 13 Principle XVI commits to the delivery of ‘high quality, frequent and accessible public transport services through the whole site which provide links to new community facilities, as well as to York city centre and other appropriate service hubs, including University of York. A public transport hub at the local centre should provide appropriate local interchange and waiting facilities for new residents. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport.’ In CYC/79, the Council states that ‘a segregated route [for buses] over the A64 will be provided to ST15’. Yet this scheme is not included in the list of costed infrastructure measures, and we conclude that no attempt has yet been made to design or assess such a link. Indeed, it is unclear what form such high quality, frequent public transport services would take. Possibilities include extending the park and ride service from Grimston Bar and the University bus services from Campus East. But both of</p>	
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	<p>these would add significantly to the cost of such services, and potentially reduce the quality of service for existing users. This might mean the only practical solution is a dedicated service between the site and the city centre, complementing these existing services and coupled with a significant increase in bus priorities to support them all. However, as we note above, we very much doubt that such a service could become commercially viable with so low a planned population. Policy SS13 para 3.67 requires a detailed analysis to confirm that sustainable travel options are realistic and financially sound.</p> <p>This is a matter which must be resolved before approval is given to this strategic site, and the overall allocations. We strongly recommend that the Inspectors return to this issue in Phase 4 of the Enquiry, and instruct the Council in the meantime to present evidence as to the effectiveness and viability of the solution which it proposes.</p>	
7.2 Are the Green Belt boundaries reasonably derived?		
7.3 Does the proposed allocation respond adequately to the presence of the SINC?		
7.4 Is the allocation viable and deliverable given the infrastructure requirements, in particular?	<p>No, as we argued in previous submissions, particularly in our phase 2 Matters 1 questions 1.1 &amp; 1.2, 4.1. As we say above, this is likely to be even more the case with the revised scale of the projected traffic, the infrastructure costs already at £76 million, and the outstanding issues flagged in the National Highways / Council Statement of Common Understanding throwing even more questions up on this. So too will the work on the impact of the proposed mitigations the Council has promised to produce in advance of Phase 4 of the Enquiry, which will probably need enhancing significantly if they are to meet the Council's statement in EX/CYC/79 that infrastructure measures are included 'to ensure transport impacts of new developments are mitigated; including reducing demand on the</p>	HS/P2/M1/SV/16 & HS/P2/M4/SS/21

	<p>road network through infrastructure projects to deliver a significant modal shift towards walking, cycling, and bus travel.’</p> <p>However we suspect this work is more likely to point to the better solution being to revert to the previous 2013 ST15 site. We would ask the inspectors to specifically recommend the latter option is examined in the Council’s further work. We would also recommend that the Inspectors defer a decision on the allocation until this has been done for Phase 4. The scale of these costs are crucially likely to severely compromise the current reduced sites ability to deliver the anticipated level of affordable housing too, again reinforcing the case for a much larger development to spread the costs and keep the affordable housing numbers up, better meet the city’s needs for more housing, and more affordable housing and to deliver that in a more sustainable manner.</p>	
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**Matter 10: Housing Mix and Density**

**We note that there is a slot for a matter 10 on Housing Mix and Density on the agenda for pm 12<sup>th</sup> July, but this was not listed in the Phase 3 Matter in Questions list e-mailed to us on 1<sup>st</sup> June, and we do not know what the questions are. We are interested in this matter and would have registered if it had been on the list.**