

York Labour Party (YLP) Phase 4 MIQ Response

Matter 7 – Transport and Air Quality

Inspector's Question	Our response	References
<p>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?</p>	<p>As the Council's own successive transport topic papers and the latest transport modelling report Ex/CYC/87a shows, whether the planned increase in development is assigned as proposed in the Local Plan, or distributed consistently across the city, car journeys are predicted to rise by around 15% by 2033, and public transport journeys to fall by around 4%. These trends run counter to the targets set in the Council's recently published draft Climate Change Strategy, which envisage a 25% reduction in person travel, a 3% reduction in road use and a 25% increase in bus use by 2030. They also suggest that congestion will increase, and hence demonstrate a failure to satisfy Para 3.12 of the Local Plan which says that new development should not lead to increased congestion, should facilitate the use of sustainable transport, and should minimise the future growth of traffic. Cumulative the increase in congestion is significant as will be the economic cost from longer and less reliable journeys.</p> <p>CYC/87 only provides selective information on changes in traffic flow and in queue lengths on the overloaded primary road network in the city; fuller information is clearly available but has not been provided. The only comprehensive data is on travel times for selected routes. CYC/87 therefore gives a very misleading impression when compared with the more comprehensive DfT traffic count data which show continuing traffic growth up to 2019, with a 27% increase in traffic between 2011 and 2019. See figure below:</p>	

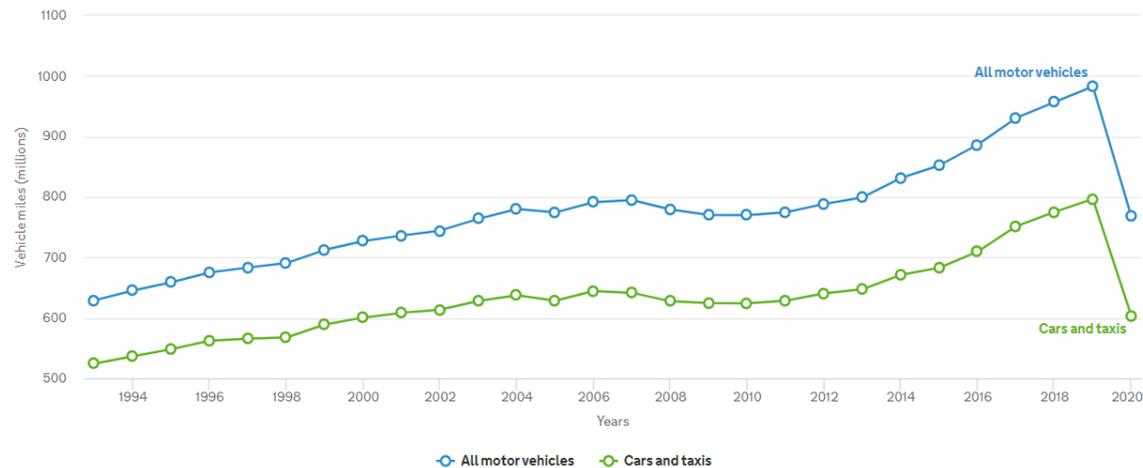
Count points: 120
Time period: 2000 to 2020
Source: [Road traffic statistics](#)

[Road traffic statistics - Local authority: York \(dft.gov.uk\)](#)

0.77 billion vehicle miles were travelled on roads in York in 2020.

Annual traffic by vehicle type in York

Traffic in Great Britain from 1993 to 2020 by vehicle type in vehicle miles (millions)



The explanation for this difference, we suspect, is that much of the growth has occurred on the secondary road network most of which runs through overwhelmingly residential areas of the city and which is wholly unsuited for the traffic which now uses it given its impacts on the environment, safety and quality of life. Spread of traffic to the peak shoulders (i.e. outside the peak hours measured & modelled with the growth of more flexible working hours has probably also played a role. Thirdly, the recently released data for the 2021 census indicates that population in York has only risen by 2.4% in the last decade, which also calls into question the data presented on page 9 of CYC/87.

	<p>Moreover the principal population growth has been in the student age group and those over 65 who respectively have low car ownership or who travel less. Any growth in traffic will thus have arisen from a greater propensity to travel among the existing population.</p> <p>The picture shown in CYC/87 on the principal road network almost certainly indicates significant trip suppression and re-routing to secondary roads as a result of traffic congestion. The projected upgrades to the ORR may well allow such suppressed trips to reappear on the road network. This assessment is reinforced by the results in Table 2, which indicate that, on the one section of the outer ring road to be improved (the A59 roundabout) traffic levels increased by 23% in the first seven years after the upgrade, despite continuing capacity constraints to the east.</p> <p>Thus the basic premise of CYC/87, that the predictions in CYC/87a will overstate the growth in traffic, is grossly misleading, and the Council's failure to address the serious adverse effects of growth in traffic on secondary roads and outside the measured peak hours is wholly unacceptable.</p> <p>We would therefore ask the Inspectors to discount the arguments in CYC/87 and accept the predictions in CYC/87a as reasonable indications of the growth in traffic which is likely to arise as a result of the Plan. We also suggest that the Council be asked to explain the marked inconsistency between its understanding of traffic flow changes and that recorded by government.</p> <p>We had previously expressed our concern that the Transport Topic Paper made no attempt to assess impacts of the transport system on other policy objectives, including changes in carbon emissions, air pollution, casualties and inequalities in access. Unfortunately, although the Council's new strategic model is</p>	
--	---	--

designed to provide such information, no such results were presented in CC/87a. Subsequently, the Council issued CYC/91, which purports to estimate the changes in carbon and local pollutant emissions between 2019 and 2033 as a result of the Plan. These show reductions of 29% in CO₂, 65% in NO_x, 4% in PM₁₀ and 9% in PM_{2.5}. We comment on the implications of the predictions for carbon emissions in our response on Matter 13, and for local emissions in our answer to Question 7.3 below. At this point we simply note the following weaknesses in this analysis:

- it fails to present the assumptions on which these estimates are derived; those for NO_x in particular appear to us highly suspect;
- it fails to answer the key question, which is how much these emissions would fall were the developments in the Local Plan not to take place;
- it fails to assess the distribution of local pollutants across the network, and hence the implications for AQMAs;
- it makes no attempt to compare these predictions with the Council's own targets; for CO₂ the 29% reduction reflects a reduction of perhaps 35% from 2005, which is only half of the target which the Council has set itself for 2030, thus reinforcing our concern that the Plan as it stands is incompatible with the Council's other strategies.

It is clear to us, therefore, that reports CYC/87 and CYC/87a reinforce the need for the Council to identify and assess ways of mitigating such impacts of development. During Phase 2 the Council committed to doing so, and to

	<p>reporting in good time for the consideration of these results in Phase 4 of the Inquiry. This was reinforced in ex/CYC/87 which stated:</p> <p><i>“The draft York Local Transport Strategy, which will be presented to Phase 4 of the Examination will provide further detail of policies which will be used to achieve effective mode share in the existing built-up area of York. This will be additional mitigation to that assumed in the modelling presented here and is intended to deal with general transport issues and ones that lie outside the Local Plan, although they will also assist in managing the trip growth from the development proposed by the Local Plan.”</i></p> <p>As of the day before the deadline for written submissions this promised strategy has not been made public, though we are aware the Civic Trust has had a statement shared with them privately. We refer the inspectors to the Civic Trust response in their written submission. Suffice to say we understand that it in no way meets what was promised by the Council, nor what is required by the DfT’s 2015 guidance on transport evidence.</p> <p>Given the Council’s failure to present a full range of impacts or to identify and appraise a range of mitigation measures, neither it nor we can reliably answer the Inspectors’ questions above. However, we can conclude as follows:</p> <ol style="list-style-type: none"> 1. The evidence in CYC/87, CYC/87a and CYC/91 indicates that the development anticipated in the Local Plan, however distributed, will lead to changes in travel and congestion which are incompatible with the principles of the Plan and with the Council’s own draft Climate Strategy. In the absence of mitigation, these impacts will not “fall within reasonable bounds”. 2. The Council has provided no assessment of the improvements which might be undertaken, and therefore it is impossible to say whether any such 	<p>ex-cyc-87-local-plan-forecasting-report (york.gov.uk)</p>
--	---	---

	<p>improvements would be cost-effective or would “effectively limit the significant impacts of development”.</p> <p>We do not understand why the Council appears unable to think strategically about transport policy, and hence to offer the Inspectors a justification for this part of the draft Local Plan. Regrettably we have to recommend to the Inspectors that any decisions on the transport policies of the draft Local Plan should be deferred until the Council has issued, and consulted on, a convincing draft Local Transport Strategy.</p>	
<p>7.2 Are Policies T1 to T9 justified and would they be effective?</p>	<p>No they cannot be evidentially justified or their effectiveness judged, substantially for the reasons given to question 7.1 above regarding the absence of a coherent evidence based transport strategy against which the various policies could be evaluated, and partly for other reasons including those outlined in our original submission, and in the phase 2 hearings Matters 1 & 4 in particular. Our original submission section 7 also lists a number of requested amendments to these policies to make them more fit for purpose.</p> <p>Our no answer is also because the major developments in terms of the Climate Emergency that we have covered in our successive submissions on that topic, including the amended climate change act net zero target, etc., requires much stronger and faster actions to reduce carbon emissions. This has a massive impact on what needs to be done on the transport front. This is touched on in the transport section of the Council’s draft climate strategy (ex/cyc/104) but also in the independently produced York Civic Trust’s spring 2022 draft transport strategy (ref on right), which comes up with broadly similar conclusions on the scale of what needs to be done, which are incompatible with the trajectory shown in ex/cyc/87a. In the absence of the promised Council transport strategy we would ask the Inspector’s to use the Civic Trusts strategy as a proxy for what broadly needs to be done, and we’d specifically request that that document is added to the enquiry’s evidence base, and read by the Inspectors.</p>	<p>SID/364</p> <p>Final-YCT Transport-Strategy-2022 DIGITAL.pdf yorkcivictrust.co.uk</p>

	<p>We think the inspectors will then see why it is essential, even at this late stage, that the Council does produce its own transport strategy and properly evaluates what mitigations are required for this plan and the appropriate set of detailed policies and measures to deliver what's required.</p> <p>We would also draw the Inspectors attention to the civic trusts very detailed written submission in response to this question which raises a large number of detailed points that should be addressed which we are broadly supportive of.</p>	
<p>7.3 Will the (cumulative) effect of the Plan on air quality be acceptable?</p>	<p>No. The massive increase in traffic and particularly congestion evidenced in the Transport analysis work undertaken by the Council is likely to reinforce the Air Quality problems at a number of city centre locations in terms of both the UK NO₂ and new PM_{2.5} limit. Prior to the pandemic there had been little or no reductions in some of the breach and near breach areas for several years as can be seen from the key graphs in the Council's latest 2022 air quality update report (see pages 30 & 73 for annual mean NO₂ in areas of breach and at the automated monitors respectively, page 75 & 79 for PM₁₀ and page 81 for PM_{2.5} at the automated monitors. It should also be noted that because of their size and difficulties locating them on restricted pavement areas the automated monitors are not necessarily located in the worst locations and tend to underestimate the real levels – as the comparison between the page 30 & 73 graphs shows).</p> <p>It's also important from a health point of view to look at the wider picture. Whilst the UK Government has set its specific target limits, the actual evidence points to there actually being no safe limit (at least down to reliably currently measurable values) for these pollutants in terms of their effect on human health.</p> <p>The limits themselves are a compromise between the level of ill health and premature deaths caused and costs and deliverability considerations. The current UK annual mean target for NO₂ emissions at 40µg/m³, which was meant to have been achieved by 2015, is four times the updated 2021 World Health Organisation's (WHO) health based air quality guidelines (AQG), the PM₁₀ 1.6 times and the proposed new UK PM_{2.5} target double the updated long-term</p>	<p>http://jorair.co.uk/wordpress/wp-content/uploads/2022/05/CYC ASR2022DRAFT.pdf</p>

	<p>(annual average) AQG for PM₁₀ is 15µg/m³, for PM_{2.5} is 5µg/m³ and for NO₂ is 10µg/m³.</p> <p>The UK Government's expert committee has very recently reviewed the WHO's 2021 air quality guidelines (AQG) and their conclusions (July 2022) are that <i>"Overall, COMEAP's view is that the WHO's revised AQGs for pollutants in outdoor air are suitable as long-term targets to inform policy development. We stress that the AQG values should not be regarded as thresholds below which there are no impacts on health - the current evidence has not identified thresholds for effect at the population level, meaning that even low concentrations of pollutants are likely to be associated with adverse effects on health. Therefore continued reductions, even where concentrations are below the AQGs, are also likely to be beneficial to health."</i></p> <p>As can be seen by looking at the Council's 2022 air quality results, NO₂ and PM_{2.5} emissions at all of the sites on the graphs are well in excess of the WHO guidelines indicating continuing health harms and therefore major reductions in transport related emissions must be a key priority for the Local Plan from a health point of view. This reinforces the unacceptability of the projected traffic and congestion impacts of the current plan, and for the much stronger transport policies and more sustainably based spatial we have argued for above and/ or at previous hearing sessions.</p>	<p>COMEAP statement: response to publication of the World Health Organization Air quality guidelines 2021 - GOV.UK (www.gov.uk)</p>
<p>7.4 Will Policy ENV1 prove effective?</p>	<p>No. There has been an existing policy similar to this in place for many years and it has had very little or no effect on improving air quality. The impacts from an individual development at local junctions often do not lead to breaching the statutory limits because of the headroom to those limits, and the impacts at remote junctions which are in or near breach tend to represent a small proportion of the total effects at those locations are therefore ignored, resulting in no amendments to proposals nor of the provision or funding of mitigatory measures.</p> <p>The policy also fails to address what will be the significant cumulative impact of the total of new developments proposed in this plan on areas at or near</p>	

	<p>breaching the statutory limits, let alone the health impacts below those limits that we identify in 7.3, and this policy should be amended to recognise this issue and for at least medium to large developments to contribute to generic measures to mitigate and reduce emissions in those locations. The Council's 2012 Low Emission Strategy and expired Air Quality Action Plan 3 (both in the Plan evidence base documentation) list an extensive set of mitigatory measures that could be implemented, but for the extremely constrained Council funding position. Positive funding contribution via section 106 or CIL payment arrangements could address this and help mitigate these cumulative effects.</p>	
--	---	--