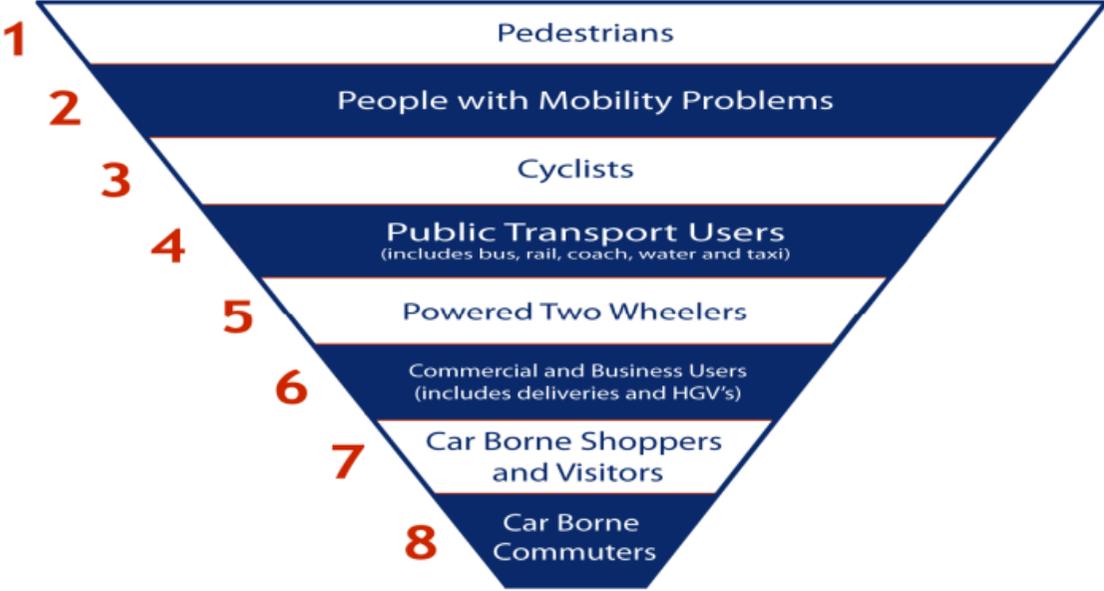


## York Environment Forum (YEF) Phase 4 MIQ Response

### Matter 12 - General Development Management

Inspector's Question	Our response	References
<p>12.1 Does the approach of Policy DP1 (York Sub Area) accord with the Plan as a whole?</p>	<p>Given City of York Council's declaration of a Climate Emergency in 2019, with ambitious to become a net-zero carbon city by 2030, this should be specifically acknowledged in a new sub-section of Policy DP1.</p> <p>Additionally, as we indicated in our previous comments on the economic development side of the local plan, York's role as a rail industry hub (not just as a public transport node) should be recognised in a separate sub-section. Finally its strong role in the bio-science sector, now picked up in a much wider sense as one of City of York Council's five key aspirations encompassed the proposed York &amp; North Yorkshire devolution deal is 'investment in low-carbon technologies ... to develop an innovation ecosystem connecting academia, industry and policy makers (known as Bio-Yorkshire), ... bio-tech incubator hubs and ... a bio-tech innovation accelerator to bring visibility to Bio-Yorkshire as a global centre of excellence.' Reference to these aspirations should be included in a further new sub-section of the Policy.</p>	<p><a href="https://www.york.gov.uk/devolution">https://www.york.gov.uk/devolution</a></p>
<p>12.2 Is the approach of Policy DP2 to 'sustainable development' a sound one?</p>	<p>No, it isn't, as we referred to in our response to Phase 2 Matters 1 &amp; 4, we consider principle ii as set out in policy DP2 to be unsound. The Plan gives insufficient consideration to the relationship between land use and transport, and consequent environmental impact. This is contrary to NPPF12, para 17, which requires 'actively manage patterns of growth to make 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 believe that the quantum of development proposed for the strategic housing sites is too small to provide the necessary social, cultural and community support</p>	

	<p>needed, given their distance from existing centres. Successful garden villages must be broadly self-contained in terms of primary schools, basic shopping, recreational and community facilities, some employment, and public transport links to major employment, shopping, health services and secondary schools. We recommend that a specific requirement is added into the policy to ensure that each major strategic site is of sufficient size to support and sustain such a range of facilities. This mix of facilities is supported by TCPA (2021), RTPI (2021b), TfNH (2018, 2019, 2020), TCPA (2020). RTPI and TfNH</p> <p>DP2 iv) should be amended to strengthen it as follows – edits highlighted in bold:</p> <p>Development will help Ensure Efficient, <b>and</b> Affordable, <b>and Sustainable</b> Transport Links through:</p> <ul style="list-style-type: none"><li>• delivering a fundamental shift in travel by prioritising and improving strategic public transport, cycle and pedestrian networks and managing travel demand and modal choice <b>in line with the York’s Hierarchy of Transport Users</b>;</li></ul>	
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	<p><b>Figure 1.2: Hierarchy of Transport Users</b></p>  <p>* Note: Pedestrians with mobility problems are given the highest priority</p> <p>and</p> <ul style="list-style-type: none"> <li>• improving the strategic highway network capacity <b>where it can justified against a holistic Economic, Social and Environmental appraisal, including the acceptability of its carbon implications</b>, whilst protecting residential areas, including safeguarding <b>strategic routes and sites (for all modes)</b></li> </ul>	<p>See York's Local transport Plan 3 -<a href="#">Microsoft Word - Published Full LTP3 (york.gov.uk)</a></p>
<p>12.3 Do Policies DP3 and DP4 provide an effective basis for subsequent decision-making?</p>	<p>As we referred to in our response to Phase 2 Matter 1, Policies x and xi of DP3 are dilutions of the Core Planning Principle outlined in the NPF. We recommend that these policies be strengthened by replacing the words “promote”, “promoting”, “where possible” by text which imposes a clear comment to achieving the outcome specified in the 2012 NPF.</p>	

<p>12.4 Is the approach of Policy DM1 to infrastructure and developer contributions a justified one?</p>		
<p>13.1 Is Policy SS1 a proper reflection of the Plan as a whole?</p>	<p>No it does not for the reasons we outlined in our original submission SID/374, (which we would draw the inspectors attention as regards some suggested wording amendments to the transport bullets) and at subsequent hearings.</p> <p>We repeat our welcome in principle on question 2.4 for the inclusion of an affordable housing headline target figure in this policy (cf the Council’s recently deposited document Ex/CYC/107/3) but believe the 45% of the identifiable need target is far too low when set against the housing crisis in this city which we have evidenced in previous submissions and most especially against the NPF 2012 Para 47 first bullet point requirement to “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework ...”</p> <p>As we have outlined under question 2.4 there are a number of avenues and sufficient viability headroom to allow several policy and plan changes to be made that would go substantially further towards meeting the NPF requirement as regards affordable housing. The rapidly worsening economic situation whilst York property prices (see press article) and rents are still rising doubly reinforces the position.</p> <p>We would also expect policy SS1 to explicitly reflect the imperative of the Government and Council’s net zero carbon targets as we have argued previously and on matter 14 here, and consequentially on the need for sustainable development design both in building aspects and in terms of design for sustainable 15 minute communities and a sustainable transport strategy.</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="#">York: Properties cost 54 per cent more than Yorkshire average   York Press</a></p>

	<p>At the moment we are still in the position that the proposed approach to new development and its location is not supported by a robust and up-to-date evidence base. There is no evidence of an analysis of relevant data, reflecting the principles set out in Policy SS1. There are a small number of maps of relevant characteristics from which the locations and sizes might arise, but these are far from comprehensive.</p> <p>No consideration has been given to the minimum settlement size necessary to support and sustain the range of local services which it will require to be sustainable as we outlined in the phase 2 hearings on matters 1 &amp; 4, highlighting the plans as evidenced in the Council’s transport topic papers to prevent “unacceptable levels of congestion, pollution and/or air quality.’</p> <p>We also do not consider that the following spatial principles that would support this have been appropriately applied, viz:</p> <ol style="list-style-type: none"><li>1. Ensuring accessibility to sustainable modes of transport and a range of services.</li><li>2. Preventing unacceptable levels of congestion, pollution and/or air quality.</li></ol> <p>The Council has not properly followed the Government guidance on the transport evidence base in Local Plan Making (DfT, 2015 in relation to NPPF 2012) that any such assessment should:</p>	
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	<ul style="list-style-type: none"> <li>· 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</li> <li>· assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport</li> <li>· highlight and promote opportunities to reduce the need for travel where appropriate</li> <li>· identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.</li> </ul> <p>The clear implication is that, where a particular pattern of development fails to satisfy the principles, alternative land use options should be considered, and that alternative transport strategies should also be assessed. The Council has failed to do this, and it is thus remains unclear whether the proposed Spatial Strategy could satisfy the Plan’s principles if associated with an alternative transport strategy, or whether an alternative combination of Spatial Strategy and transport strategy would be more effective and thus more appropriate.</p> <p>Para 3.4 of the 2019 Transport Topic Paper update said:</p> <ul style="list-style-type: none"> <li>o “The council is aware that further work may be required to identify additional transport (and other) infrastructure to lessen the impact of development, taking into account whether</li> </ul> <p>§ it is necessary,</p>	
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	<p>§ it is feasible,</p> <p>§ it is deliverable, and</p> <p>§ it does not impose such a burden as to render the Local Plan unviable.”</p> <p>· Despite this, no attempt appears to have been made since 2019 to “identify the short, medium and long-term transport proposals across all modes” and particularly those which would offset the serious worsening in congestion predicted.</p> <p>No Transport assessment including examination of the appropriate mitigation measures has been prepared in parallel with the plan or consulted on as called for in paragraph 005 of the DfT guidance:</p> <p>“The transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example, the Local Economic Partnership.”</p> <p>Thus, in answer to the Inspectors’ question the Plan is incompletely prepared and remains unsound, so the question cannot be soundly answered.</p>	
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