

Comments for Planning Application 18/01884/OUTM

Application Summary

Application Number: 18/01884/OUTM

Address: York Central Leeman Road York

Proposal: Outline planning application with all matters reserved for the redevelopment of York Central, Leeman Road to provide a mixed-use development comprising of up to 2,500 homes (Class C3) up to 87,693m² of business use (Class B1a/B1b), up to 11,991m² of retail and leisure use (Classes A1-A5 or D2), Hotels with up to 400 bedrooms (Class C1), up to 12,120m² of non-residential institutions (Class D1) for expansion of the National Railway Museum and provision of community uses all with associated works including new open space, parking provisions, demolition and alterations to existing buildings, and associated vehicular, rail, cycle and pedestrian access improvements.

Case Officer: Kevin O'Connell

Customer Details

Name: Dr David Fraser

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Comment Details

Commenter Type: Consultee response

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Planning Committee of York Civic Trust considered this application at its meeting on 13 September 2018.

The Trust has long supported the redevelopment of the York Central site, believing it to be a once-in-a-century opportunity not only to develop the site itself but to provide York with a new quarter with transformational potential for the city.

The Trust held a series of workshops for its members on York Central in February 2018. The Trust's objection to this outline planning application is the result of insufficient provision in the application to fulfill the four, broad directives that our members gave in the February 2018 workshops.

Given the unique opportunity, in our view, the proposals for York Central need to follow the four directives:

1. Pursue a clear vision of what the project can offer the city;
2. Grasp the unique opportunity to improve York as a whole;
3. Be ambitious in its aspirations, remarkable in design, and extraordinary to experience;
4. Needs to recognise and address transport and linkages as a key issue.

We recognise the constraints of the site and of the funding environment around which the applicants have had to work, but we remain convinced that York and its citizens deserve a more ambitious, distinctive and sustainable scheme than is currently on offer. More work can deliver those aims and ensure the opportunity is not lost.

1. York Central has no clear vision:

The limitation of any outline planning application is that it will establish only a set of agreed parameters for future development, with the vast majority of the details to follow in subsequent application(s). Indeed, this application plainly refers to it being only 'illustrative' and representing only 'one possible way the principles described by the Masterplan and Design Guide could be applied, to create a vibrant and sustainable piece of city' (Design & Access Statement [DAS], p.12). However, there remains a lack of a clear vision in the masterplan. This is especially so when considering: what will make York Central successful and unique in terms of place making in the UK? What will make it contemporary? What will make it resilient to changes in the way we will live and work in the future? The proposal's reliance on car access and parking, a predominant and traditional ribbon development along a main 'Spine Road' route, and large rectangular residential and commercial units are uninspired answers. The application is almost silent on how this approach will assist or inspire the city to find new solutions for its future transport, social and economic success.

2. To serve York as a whole:

New residential, retail and office units from York Central will benefit the city, inasmuch as there is an on-going need for housing in the city and employment and commerce would be boosted. But such benefits need not be seen as unique to this particular proposed scheme. The scheme could be realigned in any number of ways to bring similar or different benefits, with greater or less commerce or residences, or perhaps more communal or cultural provision. Overall, there is no current sense that the outline application is about helping York to thrive, rather than simply delivering a successful local development. York Civic Trust believes that planning must not be fixated on the area within the railway cordon but must be embedded in the wider city.

Many of the points outlined below indicate that rather than providing the wider York community with an unquestioned asset, York Central would be likely to exacerbate existing issues in the city. These have not been fully considered and offset in the application's documentation:

- The proposal for a spine road, freely accessible to all through and internally generated traffic and disgorging through the Leeman Road tunnel into the Station Road gyratory is simply not sustainable.

- The improvements for the National Railway Museum and its setting are not doubted, nor that NRM 'will be the cultural heart of York Central' (DAS, p.18). However, this should not come at a detrimental cost to the place making of the York Central site, nor the wider York community. The stopping up of Leeman Road could have a negative impact on the transport options for existing residents in St Peter's Quarter and the community around Salisbury Terrace. It is not possible to understand the impact until decisions are taken on the various options for Leeman Road tunnel, for the permeability of the proposed museum development and for the layout of York Central's internal vehicular, cycle and pedestrian networks; final decisions on this proposal should await fuller details.

- The proposed retention of free traffic movement through Salisbury Terrace will make life worse for local residents. It seems perverse that a scheme aimed at bringing benefits to the City should ignore the obvious transformation that could be made to the quality of life in this area.

- The overdevelopment in the York Central scheme will have a detrimental impact on the city's skyline, especially when seen from existing communities in Holgate, Acomb and Poppleton Road.

- Further to these issues is a lack of detailing and provision for social and communal infrastructure. In particular, the absence of schools in the list of considered communal facilities for the site (Sustainability Statement, 9.5, pp. 36-37) and explicit exclusion of schools as part of the proposed floor space in York Central by category use (Development Specification, Table 2.1, p.3) is deeply concerning. Local schools should be central to successful place making. The onus here is instead placed on existing 'local education campuses' (Sustainability Statement, 7, p.26) in other communities via use of the transport network. The applicant's assertion that 'Schools are not proposed within the Site, instead a financial contribution is proposed for off-site provision for foundation, primary and secondary schools to address need generated by the proposed Development' (Planning Statement, 6.7, p.44) is wholly unacceptable, especially in terms of a negative impact on place making and the consequent impact on peak hour traffic resulting directly from this approach.

According to data in City of York Council's [CYC] School Admissions Guidance for 2018-19, St Barnabas CofE Primary School, a small school with a 210-pupil capacity, of which 161 places are already taken, exclusively serves the York Central catchment area. Even if the next two nearest primary schools outside the catchment area were to be utilised by York Central residents, this would have safety considerations of walking along busy access roads or crossing the Wilton Rise railway footbridge. Besides, St Paul's CofE Primary School is already over-subscribed, and Poppleton Road Primary has only spare places for 32 pupils in a school capacity of 420. Clearly there is insufficient capacity in these schools to accommodate York Central with its ambition to

create up to 2,500 new households - more households than there currently are, say, in Copmanthorpe, Dunnington, Poppleton, or Bishopthorpe, which are each served by their own primary schools. The lack of school provision goes against the Government's planning guidelines when considering the sustainability of developments, when '[i]t is important that a sufficient choice of school places is available to meet the needs of existing and new communities' (National Planning Policy Framework, para.94). It also goes against the directive for the York Central site (ST5) in the draft Local Plan 2018: 'ix.) Ensure provision of social infrastructure which meets the needs of York Central and, where viable, the wider city communities including sports, leisure, health, primary and nursery education, community facilities and open space' (Local Plan 2018, Policy SS4, pp. 35-36). To comply with these requirements, and as a minimum, York Civic Trust request that the applicant accounts for demand for extra schooling required for York Central residents for the next 30 years.

3. York Central needs to be remarkable in design, extraordinary to experience, and ambitious in its aspirations:

York Civic Trust believes that for York Central to be a success it will need to aspire to attract commerce, York citizens and visitors alike. This will require high ambition in its aesthetics, design and how it presents itself to wider York communities.

The Trust does not want to comment on the aesthetics in terms of brick to other material ratios, or the overarching 'uniform irregularity' credo (DAS, 9.27 pp. 212; 14.1-14.4.9, pp. 400-31), other than to suggest that the units would not look out of place in many an English city's regeneration scheme being made today - as exemplified through the visual examples of similar recent schemes in Liverpool, London, Salford, Cambridge, Birmingham, Sheffield, Newcastle, Coventry... (DAS, 9.29-9.30, pp. 218-20; 13.2-13.11, pp. 377-97; 14.2.7-14.4.9, pp. 407-31) - which all goes to limit the extent to which this aesthetic will be distinct to York.

The Trust does however take issue with the scale of proposed massing in York Central. The outline application is a battle between short-term gain for profit and the need to produce a sustainable and integrated development close to the city centre. The latter has not been adequately prioritised in this scheme.

The issue is not the proposed density of construction on plan. York is a city of narrow streets and dense development and it would be interesting to see proposals which reflect this theme within York Central. The problem arises when this density is combined with excess height.

The documentation does not give the height of units in terms of storeys, rather as heights above ordnance datum (AOD) levels. The former is far easier to visualise for a non-professional audience, and we believe the application is subsequently opaque on the matter of maximum

heights. We note that the maximum developable height and massing extents in this outline application relate to the orange boxing / lines in the visualisation images, not the 'illustrated' scheme that often shows development below the orange lines. The record in York is that developers exploit the full extent of height allowed in their planning permissions and frequently return for modifications to their permissions so that height can be increased over that initially granted. (Hungate is a case in point.) The likelihood is that the eventual scheme will be taller, have a higher urban density, create more shadowing, and overall not be truly represented in these illustrations.

All the same, the visualisation images of the impact from key townscape views in the Design & Access Statement, especially from the City Walls (DAS 9.32.2, pp. 226-27), and of the North York Moors as seen from Bouthwaite Drive / Severus Hill (DAS 9.32.4, pp. 230-31) are sufficient evidence that the proposed scheme is substantial overdevelopment. York Civic Trust therefore contests the claim that '[t]he overall form of the new urban quarter in York Central shall nestle naturally into the city' (DAS 9.21, p.202). The scheme aims to match what it calls the existing "Yorkness" of the city, a fundamental aspect it defines that which 'includes a special "human scale" - an intimacy of scale' (Ibid.). Yet, such proposed six-storey+ residential units are not of an intimate human scale, nor common to York's historic development and townscape.

Due to the design layout of tall buildings along York Yard South and Station Quarter, views of Central Park from outside the site, especially from Holgate and Poppleton Road (DAS 9.32.6, p. 233), will be limited. The roofline heights of the York Yard South buildings would be between +34.5 and +38.5 AOB at a minimum, and act as a physical and visual barrier. This would undermine Central Park's ability to attract use from wider York communities.

4. Transport issues and connectivity:

4.1. Connectivity for pedestrians:

Much attention has been paid to motor vehicle movement into, out of and through the York Central site. Our comments on this are set out below. However first, we comment on connectivity for pedestrians between the site and the City Centre.

The applicants appear to rely on the two existing pedestrian routes leading eastwards out of the site: the Leeman Road tunnel and the continuation of Leeman Road towards Lendal Bridge and the station footbridge. York Central will be both a major city centre work place and a major residential centre, many of whose residents will work in York City Centre. It is inconceivable to us that these two pedestrian routes are capable of providing the quality, safety or even quantity of pedestrian access required. Station managers have continually discouraged non-rail user use of the station footbridge and it does not meet the most basic disability access standards. Leeman

Road pedestrian tunnel, even after some titivation, will always be a very poor quality main entrance route to a new city centre quarter. The pedestrian footpaths of Leeman Road itself between the tunnel and the Station Road gyratory are totally inadequate now and are not fit for purpose for what will be one of York City Centre's primary pedestrian routes. The pedestrian footways are narrow on both sides of the road; Leeman Road has to be crossed by pedestrians on this route; this crossing activity has to take place at the point where we are promised queues for the 'Option 2' traffic lights for motor traffic through the tunnel. In our view, permission for the major development that York Central warrants should not be granted without commitment to total reconstruction of this pedestrian route.

4.2. Transport Strategy:

Due to limited access for vehicles to the York Central site, there is the need and opportunity for a clear policy to be articulated on how road transport will be treated, and what role York Central should play in the broader transport needs of the City.

York Civic Trust generally supports the stance of York Environmental Forum in its objection letter to the application. In particular, we are concerned that the applicant's Transport Assessment is not sufficiently robust to fully understand the impacts of the proposal on traffic in York or to identify the necessary requirements for mitigation.

The applicants' methodology is deficient in that it compares the impact of the development with the already extremely congested conditions in 2033 which CYC has forecast as arising from its Draft Local Plan (Transport Assessment, 5.3.2, p. 41; 9.2-9.3, pp. 85-89; 11.2-11.3, pp. 127-36). This results in the effects of the development being masked by those congested conditions. Moreover, they have based their predicted traffic generation on trip numbers and modal shares which fail to reflect their own ambition for the site as one which 'reduce(s) the reliance upon the private car by site users' (DAS, 9.9, p.170).

It is essential that the applicants provide a new Transport Assessment based on realistic assumptions for the 'do-minimum' conditions and traffic generation levels which are consistent with their stated ambition. Since the Access Road and Leeman Road Tunnel changes are due to be implemented by 2021, the applicants should be asked to test them against conditions in that year.

The applicant's ambition that York Central will have a reduced reliance upon the private car by site users, creating a desirable setting and delivering a multitude of environmental and social benefits' is admirable. However, the application in its current form, and the Transport Assessment for it, fail to reflect that vision.

The application fails to offer a sustainable transport solution in that York Central would continue to act as a corridor to the city centre for those approaching on the A59 and A19, and would offer inadequate provision for alternatives to the car for the 2,500 new households and businesses (for

which the proposal adopts too generous a standard for office parking) in York Central. There would only be a half hourly bus service (No.10 service) to the new residential community, limiting the incentive to use public transport, and no provision for priority for buses. There is a lack of an adequate pedestrian network away from main roads, with proposed courtesy crossings for pedestrians which will be unsafe at the traffic flows envisaged. There is only limited provision for play streets, and no control of traffic flows or speeds on tertiary routes. While one dedicated cycle route is provided, it requires shared use at both its ends, and lacks a more comprehensive cycle network. The pedestrian and cycle route to the city for residents in Salisbury Terrace area and St Peter's Quarter would be made considerably longer by the stopping up of Leeman Road for the National Railway Museum's [NRM] expansion. No detailed provision is offered for disabled pedestrians. Collectively, these factors would make York Central unnecessarily car-focused, leading to congestion and pollution from standing traffic which would adversely impact on safety and amenity for cyclists and pedestrians. This is not a sustainable or environmental solution.

The applicants should be required to adopt a set of measures for York Central to mitigate the predicted increase in car traffic through and generated by York Central. These include: lowering maximum parking standards for offices, while relocating the majority of office parking to the Park & Ride sites; providing all residential parking in car parks at the entrance to the residential area, or potentially also at the Park & Ride sites; providing centralised servicing, and avoiding having to design each street to take large vehicles; removing all on-street parking; providing a much better network of walking routes away from the access road; adding effective priorities for buses over other traffic, with more services stopping in York Central; introducing a bus-gate at the Leeman Road underpass from Salisbury Terrace; adopting 'Option 3' rather than 'Option 2' for the Leeman Road tunnel (which the applicant's own analysis indicates would add no more than 2% to time spent travelling in the peaks, and yet would overcome disruptive queuing which the application demonstrates that 'Option 2': would cause for the Lendal Gyrotory and access to the station); and 'Option 5 or 6' for the closure of Leeman Road through the NRM.

Documentation:

As a final but important point, and connected with the lack of vision, York Civic Trust wishes to register a complaint over the presentation of the documentation for this outline planning application. The Design & Access Statement alone (a small part of the overall application) is over 86,000 words long - the same length as George Orwell's 1984 or Jane Austen's Persuasion - with the Environmental Statement being even longer and the complete documentation running to several thousand pages. Furthermore, the frequent use of cross-document referencing (particularly of illustrations) and the lack of an introductory overview or non-technical summary, all goes to show that this material is presented for a professional audience with the time and energy to digest it. Consequently, true democratic consultation - which should be made accessible for all citizens of York and without the need for planning or architectural experience - is sorely

compromised here. The application should not have been accepted by CYC in its current form. The inaccessibility to commentators of what is, after all, only an outline application, places any approval at risk of challenge on the grounds of insufficient provision for consultation responses to the application.

Conclusion:

In conclusion, while York Civic Trust, in principle, welcomes the regeneration of the York Central site, the Trust objects to this outline application. It does so due to:

- An uninspiring use of the site with no overall vision to make it unique, sustainable, or as a substantial asset for all citizens of York;
- Substantial overdevelopment of the proposed York Yard South and Station Quarter sections, given the height limits proposed;
- A lack of school provision;
- A lack of provision given to sustainable travel for occupants of York Central and the resulting impact on wider congestion and pollution in the city.