

RYEDALE LDF

THE RYEDALE PLAN

Comments of Councillor Paul Andrews

Comments on Highways

Highways – Strategic Transport issues

There are five main highways issues:

1. Capacity of junctions within Malton/Norton to accept new developments;
2. Access from the A64 to Malton/Norton, including supplementary and other proposals;
3. The Council's recent decision to improve the Brambling Fields Junction, and the impact of this on air pollution and future development;
4. The Relationship of forecasts for retail under TRICS to retail quantitative capacity;
5. The Malton and Norton Neighbourhood Plan

Capacity of junctions

Jacobs' document entitled 'The Malton and Norton Strategic Transport Assessment', as presented to the Council and subsequently finalised in June 2010, identifies a number of key road junctions within Malton/Norton and examines whether or not these are over-capacity and the impact on them of future planned development.

The junctions analysed are Butcher Corner, Welham Road Junction, Castle Howard Road Junction, Pasture Lane Junction, Westfield Way Junction, Town Street Junction, Railway Street Junction, Norton Road

Junction, the Level Crossing, Wold Street Junction and Mill Street Junction.

Many of these junctions, particularly Butcher Corner, are already well over-capacity. It should be noted that the report does not analyse the present position, because the starting point of any comparison has to take into account all development which at the date of the report has either been given planning permission or which is on land allocated for planning permission (at the date of the report).

If, however, the sites to be taken into account at the starting point can be vastly inflated, the argument can be made that instead of comparing the impact of new development on the junctions on the basis of their existing capacity, one should compare the impact of new development on the junctions on the assumption of the inflated figures.

In the draft report issued by Jacobs in February 2010, paragraph 3.3.3 listed a number of development sites as those ‘which have been given planning permission or have applied for planning permission and are therefore committed or allocated and are likely to be developed first.’ These are referred to as “Group 1 sites”

The list is exhibited in Exhibit **EXH1**

However, it was pointed out to Ryedale’s planners that many of these sites did not have planning permission and were not allocated. See Figure 1 below:

Figure 1

	SITE	CURRENT STATUS (All sites within housing development limits unless otherwise stated)	STATUS IN GROUP 1	COMMENTS
1	Livestock Market	Outside town centre commercial limits, used for livestock sales and residential	Retail (convenience) and residential	Cannot be developed unless Livestock Market moves and TC commercial limits changed; forms part of an overall “Revitalisation plan” which is in direct

				competition with RDC's proposals to redevelop WWSCP; proposals shown on Table 3.1 not the "Revitalisation Plan" proposals, but another scheme invented by RDC and not the subject of any planning application – all matters which require resolution through the LDF and not ad hoc in advance of it. Should not therefore be treated as a foregone conclusion.
2	Wentworth Street Car Park	Car Park. Outside TC commercial limits	Retail and Residential – includes 3,000sq.m supermarket	Cannot be developed unless TC commercial limits changed under LDF; a highly controversial site which at the time of the report did not have planning permission or any outstanding application; will add considerably to pollution, and may be contrary to Air Quality Management Order - all matters which require resolution through the LDF and not ad hoc in advance of it. Should not therefore be treated as a foregone conclusion. Ryedale are currently going for giving planning permission for a superstore on this site in advance of the EIP.
3	Pasture Lane/ Showfield Road	Unallocated	Residential, employment and retail (bulky goods – ie not convenience)	Needs allocation – a site which might be given consideration (after all due consideration)), but even so, this should remain part of the LDF process.
4	East Mount/Old Malton Gate	Is this site within the housing development limits?	Residential	Please define status (in or outside housing development limits)
5	Mount	Commercial –	Residential	The hotel site is now

	Crescent Hotel	hotel		under new hotel/bar management and is not available for residential. The buildings behind the hotel could be used for employment purposes.
6	Ryedale Business Park, Eden Road	Green field site, outside TC commercial limits, outside housing development limits, and NOT allocated for industrial or employment use	12,000 sq.m employment site	Another highly controversial site; planning application for only one third of it called in in 2007, and then withdrawn in the face of massive public opposition. All matters relating to this proposal require resolution through the LDF and not ad hoc in advance of it. Should not therefore be treated as a foregone conclusion.
7	Manor Park, Old Malton	Planning permission for employment granted ad hoc	Employment	Another site granted planning permission in the face of huge public hostility.
8	Highfield Lane	Residential	Residential	
9	Barton Cottage	Planning permission for residential granted in accordance with current policies	Residential	
10	Land West of York Road Industrial Estate	Unallocated?	Employment	May need allocation under LDF
11	Norton Grove Industrial Estate	Unallocated?	Employment	May need allocation under LDF
12	Redrow Housing Site, Scarborough Road	Planning permission for residential granted	Residential	
13	Sheepfoot Hill, Castlegate	Outside TC commercial limits; current use employment	Retail (11,100sq.m)	Not clear if this is to be entirely for “comparison” goods or to include another “convenience” supermarket. Size of these proposals will have devastating traffic impact

				on Castlegate and Butcher Corner, which will be made worse by the proximity of Morrisons (including new extension) and Lidl. This will add considerably to pollution, and may be contrary to Air Quality Mangement Order. All matters relating to this proposal require resolution through the LDF and not ad hoc in advance of it. Should not therefore be treated as a foregone conclusion.
14	Former Travis Perkins Builders Yard, Yorkersgate	Currently employment	Residential	May need allocation under LDF
15	Robsons Garage, Welham Road, Noton	Outside TC commercial limits, but granted permission ad hoc 12 th May last year	Retail (convenience)	This permission limits the Council's options under the LDF in regard to new retail convenience floor space.
16	Former Dewhirst Factory, Welham Road, Norton	Outside TC commercial limits. Planning permission granted against officer recommendation Planning permission not implemented by applicant ALDI	Retail (convenience), education and housing	RDC's own consultants recommended refusal. This site should therefore definitely not have been included in this list at the date of the Report. Consultatnts advised that, if granted ad hoc, the permission would limit all the LDF retail options in Malton town centre. Will add considerably to pollution, if built, and may be contrary to Air Quality Management Order
17	Elements of the Woolgrowers' Site	Land is believed to be unallocated and within an area liable to flooding.	Residential	This land requires allocation under the LDF – in competition with other sites

As regards the above:

- 1. Malton and Norton Town Councils have both indicated that they do not want to have more than 1,000 new houses in Malton/Norton. The total number of houses in 'Scenario 1' (667 houses plus 4.6ha may not exceed this number, and it may therefore be arguable that it is reasonable to assume that most of these sites can be viewed as a kind of baseline – subject to all the qualifications and reservations you have mentioned. Even so, Item 5 should not be included.*
- 2. The same cannot be said in regard to proposals for retail (convenience, i.e. new supermarket proposals), where at the time of the Report, the Council's consultants advised to stick to a limit of 2,164 sq.m – a limit only to be reached by 2021. It is therefore not appropriate to include items 1,2 and 16 in the Group 1 list, as these have to be looked at as competing sites. Added together, their total size exceeds 6,000 sq.m. – well in excess of what is recommended in the first draft Ryedale Plan (2,801 sq.m). or the current draft (1,890 sq.m) There should be a separate 'scenario' for each one.*
- 3. Some of the employment sites are Brown Field and it is arguable that it may be reasonable to view these sites as included in the Group 1 baseline. Other sites are Green Field and should not be automatically seen as part of the 'Baseline'. On this basis, Item 6 should definitely be excluded from the Group 1 baseline, and possibly some of the others.*
- 4. The site at Sheepfoot Hill/Castlegate (No.6) should be excluded from the Group 1 list and dealt with separately.*
- 5. The main criticism of this exercise is there are two rival schemes for improving Malton – the Council's scheme to redevelop WWSCP and the proposals in the Malton and Norton Interim Neighbourhood Plan, which has the support of local businesses. RDC is a public body, financed out of public money and its purpose is to promote the interests of the community and not just to look after its own corporate interest. The highways impact of both schemes should have been examined, evaluated and*

compared, so as to enable members to form a balanced opinion to enable them to choose between either scheme. By putting WWSCP into a list of sites which are assumed to be “developed first”, the Council has failed to do this.

The draft STA was received with widespread public outrage, and these issues were pointed out to RDC, and the Council’s intention was to go out to public consultation. In the event RDC did not go out to consultation, but simply revised the STA document and published it on the WEB as the ‘Final Version’. This has been issued as a working document “for the guidance of future development”.

The ‘Final Version’ maintains exactly the same list of ‘Group 1’ sites, but lists them as ‘development assumptions’ without providing reasons to explain why it is assumed that such sites should be developed, or providing the source of the list.

The perversity of this list is most obvious from the convenience retail proposals, which exceed 6,000 sq.m of new shopping space. Not even the first published draft Ryedale Plan favoured more than 2,801 sq.m

It is considered that Jacobs can in no way be held responsible for this list of ‘development assumptions.’ The Jacobs report has been done by traffic engineers, and so all the data about development assumptions would have had to have been provided by Ryedale. The findings of the Jacobs report therefore must in part depend on the instructions given by RDC in terms of these ‘development assumptions.’

The Report then considers ten development scenarios (1-9 and 4A). All of these scenarios include all of the ‘Group 1’ sites. The effect of the report is perverse because, as appears from Figure 1, the ‘Group 1’ sites have been artificially inflated to include a substantial number of sites which at the time of the report were either unallocated, outside commercial or development limits and/or highly controversial. Furthermore, no comparison has been made with the capacity of junctions to deal with traffic from existing or committed development (including planning permissions already granted and sites allocated or within existing commercial or development limits).

Scenario 1 includes all the ‘Group 1’ sites, and the report proceeds to compare it with the other nine scenarios in order to ascertain whether or not the traffic impact on junctions generated by each would exceed that generated by Scenario 1. By this method they reach the conclusion that Scenario 4A can be recommended, even though this leaves several junctions (particularly Butcher Corner) heavily congested.

It is worth noting that the Table under Para 18.1.1 of the draft Report has been significantly amended in the Final Report, thus providing a more optimistic, if less realistic, picture.

Access from the A 64 to Malton/Norton

When the A64 Malton Bypass was built in 1964, there were three main access points to Malton/Norton, and one adopted highway (Broughton Road) which crosses it without providing access.

The three main accesses are at Brambling Fields, Old Malton and York Road. Of these, only the Old Malton access is a proper four way grade separated junction. Brambling Fields is three-way grade separated and York Road has only two slip roads. There is a turning circle at Scagglethorpe to assist traffic prejudiced by the absence of a fourth slip road at Brambling Fields, but this has never been well-used (except by public passenger transport), because it has never been properly signed.

This situation has never been satisfactory, and there has been public pressure for some time to make both the York Road and Brambling Fields junctions ‘four way’ and for a new four way grade separated junction to be built between the A64 and Broughton Road.

Public pressure resulted in the making of the Malton Air Quality Management Area Order (**Exhibit EXH 2**).

There have always been difficulties in arranging funding, and none of these schemes has progressed. However, it was eventually agreed to go ahead with the Brambling Fields Junction. This was because of the huge number of heavy vehicles servicing the Norton Bacon factory, which at one time was taking more than 10,000 pigs. Many of these heavy vehicles would drive through Malton town centre, causing heavy congestion, particularly at Butcher Corner. The drivers either did not know about the Scagglethorpe turning circle, or if they did, preferred not to use it. As all that was needed at Brambling Fields was a single new slip road, this

seemed to be the easiest and most expedient junction to deal with. New policies were devised to enable RDC to use planning gain from large developments in Malton and Norton to fund it.

However, the situation in 2011 is different. The management and ownership of the Bacon Factory has changed, and much of its work has been sent south, so that it now only deals with about 3,000 pigs.

Further, planning consent has been granted for the extension of Morrisons, a new Lidl and a new Aldi, all of which are now beginning to have an impact on traffic in the town centres of Malton and Norton. There are potential plans for new supermarkets/superstores at Wentworth Street Car Park, the Showfield and the Cattle Market. Whichever of these goes ahead, none will work properly in terms of traffic generation or the flow of traffic without direct access to the A64 via Broughton Road.

In addition, there are planned residential developments including 350 new houses between Pasture Lane and Broughton Road (of which planning permission for 263 houses has already been granted). Again, these need direct access to the A64. It would therefore seem that the priority need for a four way grade separated junction is now greater for an A64/ Broughton Road junction than for one at Brambling Fields. However, as will be seen below, the Council is currently building the Brambling Fields project.

Further, the improvement to the Brambling Fields Junction is no longer just a matter of building a single new slip road. The project has grown and the cost has doubled. The single slip road could not be built without a new roundabout and changes are now required to the bridge, even though it is already wide enough to take two-way traffic. It is not possible to have a round about at one end of the bridge without a corresponding roundabout at the other to create a full dumbbell. The building of the second roundabout cannot be carried out without a realignment of one of the existing slip roads.

In their determination to complete this project, RDC are giving planning permissions for several large housing developments on land which should not be considered for allocation except through the LDF process. This has resulted in the breach of development limits, and the potential increase of traffic generation through the two towns from the new developments. It is anticipated that the impact of these new developments will largely efface any benefit the town may receive from improvements to the Brambling Fields junction.

The Alternative Measure

Jacobs have recommended an ‘alternative town centre complementary measure’ to supplement the junction improvements at Brambling Fields. This has not been the subject of any public consultation. This is coupled with previous recommendations which they have not withdrawn.

The ‘alternative measure’ consists of a one-way section on Norton Road, Norton, open to Westbound traffic only (the Eastbound lane will be restricted to bus use only).

The previous traffic measures recommended are:

- A change in the signal timings at Butcher Corner to include an additional pedestrian phase;
- The removal of one traffic lane on the Castlegate approach to Butcher Corner, which will restrict capacity;
- An HGV ban across the level crossing except for those requiring access to local businesses.

Although Jacobs have produced figures to support these proposals, it is difficult to see how they will work. The purpose of the proposed one-way section on Norton Road is to discourage heavy traffic from the Bacon Factory from going through Malton town centre, but if there is to be an HGV ban at the Level Crossing, one has to ask why the one-way section is necessary at all. Restricting capacity at Butcher Corner is likely to increase congestion rather than diminish it.

A full one-way system around Norton Road, Railway Street, Yorkersgate, Bugtchers’ Corner and Castlegate might be worth further investigation.

The A64 Corridor Connectivity Study

This covers the whole of the A64 from York to Scarborough, of which the proposals for Malton are only a part.

These proposals are for two periods: 2011- 2016 and 2016 - 2021.

As regards the period 2011-2016, the proposal recommends ‘connecting new housing developments to local public transport, cycling and pedestrian networks.’

As regards 2016-2021, the proposal recommends: Park and Ride services to Malton Rail station; “the Increase of public transport provision from Malton & Norton throughout Ryedale District (areas with high transport needs index”

It seems astonishing that thought is being given to a park and ride system for a settlement as small as Malton/Norton. It also seems surprising that Jacobs mention increases in bus services, when both towns have fought so hard to retain the bus services they have and which seem always under threat.

There would be no need for a park and ride service or for increased public transport unless Jacobs were clearly convinced that the outcome of RDC’s current approach to residential and commercial development in Malton/Norton will generate so much traffic by 2016 that it will be impossible to travel by car comfortably and conveniently from one end of the settlement to the other.

The Brambling Fields Junction improvements

On Friday 7th October Ryedale District Council resolved to authorise the contract for work on the Brambling Fields intersection.

Copies of the Officers’ Reports are attached as **Exhibit EXH3**. At the meeting, it was stressed that the purpose of the proposed improvements was to improve air quality in Air Quality Management Area.

The works originally comprised no more than the construction of a single new slip road. However, by the time Health and Safety got their teeth into it, this had to be expanded into a complete redesign, including two new roundabouts and the replacement of a second slip road, the whole project costing nearly £6M – more than twice the cost of a single new slip road.

The cost was to be shared equally between County and Ryedale. However, it emerged during questions at the meeting that, following the reduction of government grant, County’s contribution is now limited to £800K design fees only. The rest (£5.14M) has to be recovered from developer contributions.

So, with developer contributions averaging about £1,700 per house, it would take over 3,000 new houses to pay for the work, if the work was to be paid for from house building contributions alone. This suggests that Ryedale has it in mind that some of the cost (perhaps as much as £700K) would come from developer contributions from the proposed new supermarket on Wentworth Street Car Park and other development.

It is understood that developments already approved (but most not yet started) in the last few years will yield about £1.9M of developer contributions.

Before the meeting I wrote to the Corporate Director and Section 151 Officer because I feared that the improvements would result in pressure for extensive new development in order to raise the necessary Section 106 or Community Infrastructure contributions. He assured me that member approval and the Council Tax was not predicated on developer contributions other than those received or accrued to date. Copies of the correspondence are **annexed as Exhibit EXH4.**

At the meeting, Council Leader, Councillor Keith Knaggs made it clear that planning rules would prevent Ryedale from recovering development contributions from the scheme from development outside Malton and Norton and their immediate neighbourhood.

The Brambling Fields project is designed to reduce traffic at Butchers' Corner by one third. One wonders how far this will be offset by traffic generated by the development in Malton and Norton which will have to be allowed to pay for this. As the Council were unable to specify to the meeting what new development was intended, they clearly had not made this assessment.

The Council Meeting allowed questions to officers and debate on one amendment. However, Councillor Wainwright then proposed a closure motion. So Council members were not allowed to debate the main issues.

I have supported the Brambling Fields proposals for many years, and felt I could not vote against the scheme. However, I also thought the price for the community was too high. So I abstained.

On 11th January 2012 the junction improvements came up for discussion at the County Council's Ryedale Area Committee, as the works which had by then started were prejudicing trade to Norton Town Centre. At that meeting, the County Area Surveyor conceded that one of the purposes of building the junction improvements at Brambling Fields was to open up Norton to housing development (**EXH5.**)

It will be observed that this is an instance of Ryedale making decisions in advance of the EIP with a view to presenting a fait accompli to the EIP.

Another instance of this kind of brinkmanship is the sale of Wentworth Street Car Park (subject to planning permission) and willingness to consider the purchaser's planning application in advance of the EIP.

The Relationship of forecasts for retail under TRICS to retail quantitative capacity

One residents' concern about a new superstore at Wentworth Street car park is the quantity of new traffic which it will generate, and the impact of that on the free flow of traffic through an already congested town centre with junctions which are already over capacity.

I refer to "TRICS Research Report 95/2 – Pass-by and Diverted" by JMP Consultants Limited dated August 1995, which I understand North Yorkshire County Council still rely on. According to my understanding of this, when a new store opens, 90% of traffic using the store will be making "transferred journeys", and only 10% will be new journeys. "Transfer journeys" in effect represent traffic which is attracted from other stores. It follows that, if Ryedale say the new store will not increase traffic to an unacceptable level, this can only be correct if the new store takes "transfer journeys" from customers of existing stores. If this argument is followed to its logical conclusion, one has to ask where these journeys will transfer from. The answer has to be that the existing town centre (and other nearby town centres) are bound to lose out to a very significant degree.

Ryedale cannot have it both ways: either the proposed store will generate massive new traffic, in which case the application should be refused on highways grounds; otherwise, if the site is only likely to generate 10% new traffic, one must assume that the remaining 90% or a substantial amount of the remaining 90% must transfer from other stores – in which case the application should be refused on grounds of undermining the viability and vitality of existing town centres.

However, it is understood that Ryedale and North Yorkshire County Council are not going to rely on the TRICS document, but are doing their own modelling depending on some kind of assessment of "gravity". I have requested details from Ryedale in a letter dated 16th January 2012, but so far received none.

Highways statistical methodology must clearly interrelate with retail impact assessments if it predicts where new superstore traffic will be drawn from. One cannot rely on two assessments which contradict each other. Ryedale wants to have its cake and eat it.

***The Malton and Norton Interim Neighbourhood Plan –
Approved November 2011 by both town councils.***

The relevant policies of the amended plan are as follows:

1. The upgrade of the Brambling Fields junction is agreed and supported. The Town Councils are concerned at the continuing escalation of cost, and will seek assurance that a vigorous control is maintained.
2. To press for a feasibility study and cost/benefit evaluation of i) an A64/B1257 junction (Broughton Road), and ii) a Scarborough Road to Beverley Road highway link in Norton, in order to determine the priority that might or should be given to these potential projects. In the public perception these projects are seen as key to easing traffic congestion across the towns.
3. To press for improvements to the junction between the A64 and York Road (Musley Bank);
4. To assess a full one way system – Norton Road, Railway Street, Yorkersgate, Wells Lane, Butcher Corner, Castlegate and County Bridge – from all perspectives, including safety;
5. To consider a ban on HGVs, but not on buses, in Castlegate and at the Level Crossing;
6. To consider a southern (Norton) bypass, with the possibility of a bridge(s), as set out in the ‘River Rail Corridor Study’

Conclusions

The improvements to the Brambling Fields interchange are currently under construction. Ryedale will see this as an opportunity to open up both Malton and Norton to extensive new housing and commercial development.

Even so, such new development is bound to have an unacceptable impact on the free flow of traffic through Malton, on air pollution and on the capacity of existing junctions within both Malton and Norton.

It follows that, until a new interchange is built between the A 64 and Broughton Road, only limited new development should be permitted.

The improvements to Brambling Fields should not be seen as a reason for exceeding the town councils' housing target of 1,000 new houses over the 15 years after January 2009.

The Brambling Fields road improvements will not have any significant beneficial effect on the traffic which will be generated by a new superstore at Wentworth Street Car Park.

The Ryedale Plan: Local Plan Sites Publication Stage Representation Form

Representations of Councillor Paul Andrews.

Answers to Questions 5 and 6 of the Form

Supplementary Statement and Update

MY main concern relates to highways and congestion. At the EIP into the Ryedale Plan, the Council produced in October 2010 a report by Jacobs entitled “The Malton and Norton Strategic Transport Assessment”. This is a highly flawed document, as I shall demonstrate.

It is important to note that the Start Date for the assessment is 2009 – the time of the main consultation. There was a draft dated February 2010 and the final document was signed off on 25th October 2010. The final document is almost identical to the draft.

In 2011, planning permission was given for a major housing development at “Broughton Manor” which has no direct access to the A64. This was followed by planning permission for the adjacent Showfield. These two developments form a huge housing estate of over 700 houses. They have access to Pasture Lane, and traffic generated from this huge area has to pass through Malton Town Centre before it can access the A64.

It is also important to note that, although the Ryedale Plan has a starting date in 2012, and permission for the “Broughton Manor” development precedes this date, the planning permission was issued after the Jacobs Report and should therefore be taken into account when assessing the numbers of new dwellings which Jacobs say the town can accommodate from a traffic perspective.

Ryedale District Council and North Yorkshire County Council highways have a reputation of working together so as to meet the political aims of the ruling group at Ryedale. This has included instructing consultants to produce reports to justify what Ryedale wants instead of what’s best for the towns and the district.

An example of this is what I call the “Wentworth Street Car Park (WSCP) Saga”. The Council wanted to sell a car park for a new superstore. Previous to the decision, its consultants in 2007 said WSCP was not the place for a new superstore. They repeated this in a report dated 2008. However, in reports dated 2009 and 2010 they inexplicably changed their recommendation. As a consequence there was a major public enquiry into a planning application, and an award of costs was made against the Council on the grounds that there was no excuse for some of the Council’s evidence. Notwithstanding this, the Council hired a different firm of consultants and tried to push through another planning application on the same site. The permission granted went to the High Court for judicial review and the Council was ordered to pay costs again.

The costs awarded came to several hundred thousand pounds. I asked the Council for an investigation on two occasions and both requests were refused.

Members of both Malton Town Council and RDC who opposed the car park sale were exposed to bullying and a hearing before a kangaroo court on trumped up standards charges.

My point is that Ryedale and its consultants cannot be trusted to do what is best for the town – they are only interested in promoting what is in the financial interest of RDC as a corporate body, and if this means acting against the true interests of the public and raping the town and plundering its assets, this is exactly what they will do.

Ryedale has a vested interest in the overdevelopment of Malton and Norton. They think the only place where large estates can be built are in either town, and they see this as a quick way of obtaining large sums of the government's New Homes Bonus, together with community infrastructure levy. The public interest just does not matter.

At the EIP into the Ryedale Plan I produced a number of documents to refute reports from Council consultants. These included two documents in refutation of the Jacobs Report. Both are reproduced as Exhibits 1 and 2.

Exhibit 1 was my own work and destructively analysed the development assumptions made in para. 3.3.3 of the Jacobs Report. The EIP inspector listened respectfully to what Town Council Members had to say about highways and my address in regard to the report. He said he had no highways expertise and then asked the representative from County Highways: "Is the plan robust, in your opinion." She replied "yes", and that was the end of the matter as far as the inspector was concerned.

Later on in the EIP I produced Exhibit 2, which is a report by Alan Martin, a chartered engineer who was for 31 years the senior engineer of the No.2 Area of North Yorkshire County Council which included Ryedale, from April 1974 to October 2005.

It should be noted that Alan Martin's conclusions include the following: "Whilst it has been shown that key junctions can be "tweaked" to give some increase traffic flow and capacity, nothing like the increases to be generated by present approvals and considerations can be accommodated by the existing system without either the extensive demolition and rebuilding of major parts of the town or the comprehensive development of undeveloped areas to provide for the desire lines of traffic movement generated."

Counter arguments were advanced by County and there were a series of reports and counter-reports which followed the presentation of Exhibit 2. In the end, the Inspector stated verbally his view that the highways situation and also a drainage issue were matters for consideration at the land allocation stage. My recollection is that this statement or recommendation was not included in his written report.

To be fair to the inspector, there was no direct evidence before him of the corporate self-interest of Ryedale District Council, as the planning public enquiry into the

WSCP car park saga referred to above was going on at the same time at a different venue.

Unfortunately neither I nor Malton TC nor any body else had the resources to legally challenge the Ryedale Plan when it was adopted in September 2013. So the towns of Malton and Norton had to accept a badly flawed plan and try and make the best of it.

Together with other councillors I have tried to establish the principle that any large scale new development in Malton and Norton should have direct access to a four way intersection with the A64. I emphasise that by “direct access” I do not mean “immediate” access. The purpose is not to keep traffic out of Malton or Norton but to separate traffic which wants to go to Malton or Norton town centres from traffic which wants to escape without going through the town centre. So, for example, the Beverley Road site is some distance from the four way interchange at Brambling Fields, but nevertheless has direct access to it. On the other hand, the Ryedale Council Office site has no direct access to any four way interchange, as traffic which wants to escape southwards will have to drive through Malton Town Centre, and traffic going northwards will have to drive through Old Malton.

The Beverley Road site also provides an opportunity for a relief road to enable traffic from the Beverley direction to bypass Norton Town Centre and access the Brambling Fields interchange direct.

The Ryedale House site is not only badly placed, but it should not be considered on its own. The adjacent property of Quarry Bank is owned by the police, and the police station is adjacent to Quarry Bank. It is well known that the police want to move their police station out of Malton. So you don't have to be a genius to realise that what is actually being planned behind closed doors is the development of yet another huge housing estate close to Malton Town Centre comprising both the Police station, Quarry Bank and Ryedale House.

The Jacobs Strategic Transport Assessment is out of date in any event, and so to must any policy in the Ryedale Plan which depends on it. The reason for this is that, since the adoption of the Ryedale Plan in September 2013, the railway companies have indicated they intend to more than double the use of the railway, and this will exacerbate the congestion at the level crossing in Norton.

A further point concerns the “Complementary Measures” referred to in Table 2 of Policy 10 of the Ryedale Plan. These are described as “critical infrastructure” to accommodate future development in Malton and Norton. None of these have been carried out. The proposal to have one-way traffic through Railway Street and Castlegate has been abandoned. The Council has decided not to change the traffic configuration at Butcher Corner. There has been a change of priorities at the Norton Level Crossing, which has increased the dangers to pedestrians and motorists, resulting in at least one accident and many near misses. And finally, last year the County Council at last imposed a weight restriction on traffic using the level crossing, but this is only a trial; it is not being enforced and is largely ignored.

All of this discredits the Jacobs Report and reinforces my views on site allocation.

COUNCILLOR PAUL ANDREWS

16th August 2018

Malton & Norton

Strategic Transport Assessment

Traffic Generation

Malton & Norton

Strategic Transport Assessment

Alan Martin I am A Chartered Engineer, being a Member of the Institution of Civil Engineers, a Member of the Chartered Institution of Highways and Transportation and a Member of the Chartered Institute of Management. Although now retired, I was for thirty-one and a half years, the Senior Engineer of the No. 2 Area *{Eastern}* of North Yorkshire County Council from its inception in April 1974 to October 2005 and had responsibility for the design of highway improvements and the highway aspect of Development Control.

North Yorkshire County Council. Is *[inter alia]* the local highway authority for all except trunk and special roads with responsibilities for the improvement, repair, maintenance and transportation of the roads and streets within the County of North Yorkshire.

I was consulted by Councillor Paul Andrews of Malton Town Council following the publication of the statement made by Messrs. Jacobs to assist him with the comprehension of the technicalities contained therein; Having seen Councillor Andrews' original report I agreed to assist him with its up-dating to take into account the completion of the Brambling Fields interchange, but subject to this the Report seems reasonably correct.

The purpose of the STA is to determine the amount of development which Malton and Norton can accommodate in terms of new traffic generation. The analysis is however flawed in that other generation factors could have been used which would give considerably different answers.

With reference to Messrs Jacobs addendum dated October 2010 to their main report, Section 1 refers to a partial ban on traffic movement on Norton Road, permitting a westbound movement with a (busses excepted) ban on eastbound traffic. Unfortunately the diagram does not make it clear exactly how this will be accommodated. The scheme proposed readily gives the residents of Norton access to the Railway Station, Bus Station, Medical Centre, Government offices shops and car parking on Norton Road and Railway Street but does not indicate any readily available means of access to return. The Bus contra-flow system is likely to be much abused unless reinforced with a solid construction which physically prevents any 'bollard dodging'

Throughout this addendum much reference has been made to the original report. Unfortunately this has never been made available to the public to objectively assess the complete scheme; thus the Scenarios in section 2 – 7 whilst accurately calculated by computer programme based on the data fed in are somewhat inscrutable.

Section 3 of the Final Report whilst factually accurate in its assessment and traffic generation predictions does not appear to include the existing traffic on the nodes in question; and section 3.9 gives the traffic generation assumptions made. Unfortunately this appears to be at variance with other published data such as 'Employment Densities Guide' and the County, City and Borough Council's own publication 'Parking Design Guide.' Whilst some of the tenets in the latter document have been subject to downward revision to concur with Government policy the universal overall standard of private domestic residences generating on average six trips per day still holds good; thus some of the predicted generated traffic figures (without including the existing flows) appear to be on the low side. The figures taken from the parking Guide are not the maximum given because it was a more conservative value.

Section 13 of the report clearly shows that overloading will occur at the junctions under consideration and Section 14 gives various engineering solutions and costs less than that of any statutory undertakers works which may be considerable.

The construction of a junction with the B 1257 cannot be guaranteed as the Trunk Road A 64 does not fall within the remit of the local highway authority and its construction is contrary to the principle of limited access, high volume unobstructed traffic flow embodied in the principle of Trunk Roads. The amount of traffic likely to exist or be generated needing direct access to the Trunk Road A64 and not Malton bound is a matter of some speculation and is unlikely to provide the need for this connection.

Section 7 of Jacobs final report states that Scenario 4 includes all the areas considered in Scenario 1 plus the development sites from Groups 2 & 3; thus giving the totals in Table 4.1. From the total figures given it is possible to calculate the traffic generated and trip generation. North Yorkshire County Council's own publication - Parking Design Guide - gives an excellent and comprehensive summation of this in table 4.4. In applying this it must be argued that whilst other systems may give differing answers this has been in use in North Yorkshire the city of York and the boroughs of Scarborough and Harrogate for many years as the County standard,/Contd.

/Contd..

and like all systems is only a prediction of trip generation. As not all of the developable areas will be constructed at once, another factor that cannot be totally disregarded is the national annual increase in traffic flow. Whilst this depends on many (economic and population) factors and can vary year to year its effect on existing flows and the gradual increases occasioned by future developments over a period has to be taken into account.

Table 4.4 and section 4.5 {appendices} of the Parking Design Guide gives the following factors:-
Residential 109.1 trips/hectare over a 12 hour period or 637.7 trips/100 households which equates to the universal accepted figure of 6 trips per dwelling per day.

Industrial 343.4 trips per hectare or 10.1 trips per 100 m² Gross Floor Area.

Retail (Non supermarket) 41.1 weekday trips per 100 m² GFA with an 18.1% increase on Saturdays. Supermarkets generate 115.2trips per 100 m² GFA with a 7.2% increase on Saturdays.

Education No information available other than basic parking space requirements. However there is a growth of school- run commuting and parking taking pupils to and from school.

Leisure No information available other than basic parking space requirements

Table 3.1 of the STA purports to list all new development which is either planned or under consideration which is assumed to be likely to take place and is summarised in Table 3.2. However Tables 3.1 and 3.2 do not appear to co-relate as shown:-

Table 3.1 (summarised) **Retail** $15,000 \times 0.411 + 6709 \times 1.152 + 2.4 \times 0.411 \times 10000 = 23,758$

Residential $682 \times 6 + 4.6 \times 109.1 = 4594$

Employment $[56534 \times 3 \times 10,1/100] + [6.35 \times 343.4] = 19,308$

Education allow **250**

TOTAL (trips) **47,910**

The total trip movement generated by the development listed in Table 3.2 (That already approved, or under consideration) is:-

Retail $27\text{ha} \times 41.1/100 \times 10000 = 110,970$

Residential $667. \times 6 + 4.6 \times 109.1 = 4,504$

Employment $41 \times 343.4 = 14,079$

Education allow 250

TOTAL **129,803 trips**

Difference

-81.902 trips

Table 3-3 is a summation of table 3-2 and covers twelve sites between the Trunk Road A64 and the river Derwent. Traffic generation of this development is predicted to be:-

Residential	1907 x 6	=	11,442
Employment	2.71 x 343.4	=	931
Leisure	allow		500
TOTAL			<u>12,873</u>

For comparison Table 4A on page 87 of the STA gives:-

Retail	27ha x 41.1/100 x 10000	=	111,780
Residential	2165 x.6	=	12,990
Education	allow		250
Employment	44 ha x 343.4	=	15,110
Leisure	allow		500
TOTAL			<u>140,630</u>

For comparison purposes taking table 7-1 scenario 4 which includes the whole of Scenario 1 development plus that from Scenarios 2 and 3 :-

Retail	27ha x 41.1/100 x 10000	=	110,970
Residential	3665 x 6 + 4.6 x 109.1	=	22,492
Employment	44 x 343.4	=	15,110
Education	allow		250
Leisure	allow		500
<u>TOTAL</u>			<u>149,322</u>

DIFFERENCES	(Over table 3-1)	+ <u>19,519</u>
	(Over table 3.3)	+ <u>136,449</u>

Whilst it has been shown that key junctions can be 'tweaked' to give some increase traffic flow and capacity, nothing like the increases to be generated by present approvals and considerations can be accommodated by the existing road system without either the extensive demolition and rebuilding of major parts of the town or the comprehensive development of undeveloped areas to provide for the desire lines of the traffic movement generated.

The comprehensive development of the Woolgrowers site albeit necessitating the bridging of the railway and river would enable a through link through to Welham Road to be provided thus enabling the South Western segment of a southern ring road to be provided.

The report wisely does not state or speculate on the practicality of the necessary infra-structure works necessary and from the above clearly demonstrates a wide variation in the predictability of the generation of traffic.