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By email only

Dear Jill

**THE RYEDALE PLAN LOCAL PLAN SITES DOCUMENT SITES CONSULTATION
2017**

Thank you for your invitation to consult on the Local Plan Sites Document Sites Consultation. We have reviewed the document and would wish to comment on issues that are relevant to our interests.

Our key concern is to protect the primary role of the strategic road network (SRN) and to ensure its safe and efficient operation. We would therefore have concerns over any proposals or sites which could have a material impact on this. Department for Transport (DfT) *Circular 02/2013* sets out our role in the planning process.

A review of the Ryedale Local Plan Sites Document and accompanying Policies Map has been undertaken. Where no issues were identified with the content of the document, no specific comment has been made. However, a number of issues were identified and as such are summarised within this letter.

1. Policies SD1, SD12 and SD14 all state that existing planning permissions for uses will continue to be supported in principle in the event that the current permission expires. Highways England does not support this approach. Should these sites come forward with revised proposals by virtue of a new planning application, Highways England would not automatically continue to support the principle given that there may have been material change in the operation of the SRN since the point in time when permission was granted. Instead, it is expected that Highways England would be consulted on each individual planning application in order to re-assess the impact on the SRN.
2. Highways England are unclear as to the residential figures presented within the document for the breakdown of completions, commitments, and outstanding requirements and how these contribute to the total figures quoted. For the purposes of this review, the review has focused on the breakdown by sites in



Policy SD2, but clarity is sought from Ryedale District Council on how the figures tie together.

- The cumulative impacts of allocated sites within policies SD2, SD12 and SD15 should be assessed in terms of their impact on the SRN. Of particular concern are:

Junction	Cumulative Impact to be Assessed
Musley Bank (B1248 / A64)	<ul style="list-style-type: none"> Land to the east of Beverley Road residential site Land at Old Maltongate (Ryedale House Site) residential site
Old Malton (A169 / A64)	<ul style="list-style-type: none"> Land to the east of Beverley Road residential site Land at Old Maltongate (Ryedale House Site) residential site Land to East of Whitby Road residential site Land to the East of Malton Road residential site 6.6ha B1 B2 employment site at Pickering Employment site to the north of the A64 and to the east of the A169 Flamingo Land expansion
Brambling Fields (B1248 / A64)	<ul style="list-style-type: none"> Land to the east of Beverley Road residential site Land at Old Maltongate (Ryedale House Site) residential site

- For Policy SD13, it is possible that the expansion of existing businesses could have an impact upon the SRN. Highways England would therefore require that an assessment is undertaken prior to any expansion that suitably details the impacts of the development.
- With reference to Policy SD15, no indication is given with regards to the size of any potential expansion at Flamingo Land. The location of the attraction in Kirby Misperton has the potential to generate vehicle trips at the A169 / A64 Junction at Old Malton. In addition, the NAFIC site is located at Sand Hutton in the Vale of York. Again, no indication is given with regards to the size of any potential expansion within this policy. Highways England require further information prior to confirming the acceptability of the expansion of these sites.
- It is apparent that since the publication of the Infrastructure Development Plan (IDP) in 2012 that there have been material changes in terms of a large number of development sites which are now constructed or committed, the sites that are proposed, and to the A64 Brambling Fields junction. The document is therefore less relevant than it was at the time of initial publication from the perspective of Highways England.



7. The 2016 report on transport impacts prepared by Jacobs considers only the impact on the local road network. It is apparent that the impact on the SRN has not been considered.

It is advised that further collaboration between Ryedale District Council and Highways England is required in order to establish a way forward such that the Local Plan Site Document can be fully supported by Highways England given that further impact assessment work is required.

We hope that the above comments are helpful. Should you require further information or clarification, please do not hesitate to contact us.

Yours sincerely

Simon Jones

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