

Your ref: 17/03414/EIAMAJ

Transport and Development

East Block
County Hall
Northallerton
North Yorkshire
DL7 8AH
Tel: 01609 780 780
e-mail: development.control@northyorks.gov.uk
www.northyorks.gov.uk

Our ref:

Contact: Pam Johnson

10 October 2017

Dear Sir

Proposal: Outline application for proposed Motorway Service Area (MSA) to the West side of the A1(M) with vehicular over bridge to and from southbound carriageway and partial diversion of the A168, including associated infrastructure and staff access from B6265.

Location: Land Comprising OS Field 3300 Marton Le Moor North Yorkshire

Applicants Name: Applegreen Plc

I refer to your consultation on the above application. The Local Highway Authority (LHA) has now had the opportunity to consider the documentation submitted in support of the application. The review of the documents has raised the following points:-

Extent of Red Line

1. The red line plan (162007_AFL-00-00-DR-A-01101 revP02) is the only plan which shows the full extent of the proposals in relation to the A168 and the wider environs. This shows the old and new alignments for the A168 within the red line with a lozenge shaped field surrounded by the site.
2. The LHA is concerned that the lozenge shaped area has been excluded from the site. The proposed highway works include extensive earthworks and until their full detailed design is completed and approved the LHA cannot be sure of the land required to accommodate the diverted A168. The detailed design will need to be fully compliant with DMRB and without any 'departures from standard'. The inclusion of retaining walls or proprietary embankment solutions to address lack of land for conventional embankment solutions will not be acceptable to the LHA without appropriate commuted sums for future maintenance. Consequently until the full extent of the required earthworks has been approved the LHA cannot be sure that the proposed extent of the site contained within the red line is adequate. Similarly

Continued...

by email:

Gary Bell
Harrogate Borough Council
Planning & Development

Copies to:

Highways England
AECOM
Area 6

FAO Jamey Fearnside
FAO Jon Phillip
FAO Melisa Burnham

it may be necessary to extend the northern boundary of the red line to ensure a fully DMRB compliant diversion of the A168.

New Access to fields consequent upon A168 diversion

3. There are several fields to the east of the current A168 which do not take access from the A168 and currently appear to take access from a track which joins the B6265 south of the roundabout with the A168. The northern section of this track will disappear or become unusable with diversion of the A168 as shown; parts will be under the diverted A168 and parts will be severed from the highway network by the diverted line of the A168.
4. The application shows no provision for restoring access to these fields. Provision of suitable accesses to all severed fields will need to be provided. The LHA is unlikely to agree to the creation of field accesses onto the A168 as there are currently none within 4Km of the site.

Policy Context

5. The principles of the appropriateness an MSA in the proposed location are matters for Highways England and outside the remit of the LHA.
6. Section 2 of the Transport Assessment refers to Policy from varying sources which seeks to reduce the length and frequency of motorised journeys and discourage reliance on the private car and promote walking and cycling. Whilst, by the nature of the development, these are not principles which can be applied to visitors to the MSA the LHA will expect the principles to be applied to staff journeys and deliveries. This is a matter which the LHA defended at the conjoined Public Inquiry into MSAs on the A1(M) which included a site at Kirby Hill.
7. With regard to the diversion of the A168, which is a key route on the local highway network and also serves as an emergency diversion for the A1(M), the LHA will expect the key consideration to be the safety of the travelling public.

Access to the site from the A1(M)

8. This is a matter for Highways England outside the remit of the LHA

Accident records

9. The accident record on the B2665 to west of the site also needs to be considered in the context of the rear access; data to the east of the windmill will suffice.
10. The applicant should consider if the accidents at the A168 /B6265 roundabout accidents could be attributable to the speed of traffic on the A168?

Proposals within the MSA site

11. With the exception of appropriate rear access to the site for staff and deliveries, their routes within the site and the level of staff parking to be provided, this is a matter for Highways England and outside the remit of the LHA.

Trip Generation

12. There is an inconsistency between Sections 8.2 and 8.6 of the TA and the Application Form. The number of employees should be clarified. Justification will also be required for the proposed trips generated by staff. At present the proposals appear to be based on suppositions and may under estimate the impact. Whilst this may not have a material impact on solutions, an accurate assessment needs to be provided.

13. The assumptions for Deliveries and Servicing contained in the TA section 8.7 have no evidence to support the assumptions and as such cannot be relied upon. The table supporting the section is also missing.

A168 /B6265 Roundabout Junction Assessment and Rear Access

14. Notwithstanding the above comments on trip generation the LHA does not expect there to be any issues with capacity of the A168 /B6265 roundabout given that all RFCs are less than 0.5 in the design year of 2032 with predicted queues of less than one vehicle. The controlled rear access has RFCs of less than 0.1 with development in 2032 and similarly the LHA sees no benefit in pursuing any further capacity analyses notwithstanding the need to clarify the trip generation from the controlled rear access.

Staff Framework Travel Plan (TP)

15. The travel plan can be found at Appendix K of the TA. As with other parts of the submission, matters on the SRN are outside the remit of the LHA and are for Highways England to review. This also applies to internal circulation within the site except where the circulation relates to provisions for staff via the rear access onto the B6265.
16. It is agreed that the focus of the TP should be on employee travel and deliveries to the site. Again the developer needs to clarify the number of employees as the number in the TP differs from the number quoted in the application documents.
17. It is the view of the LHA that to fully deliver the Travel Planning objectives the site will need to offer walking as a viable means of transport for staff living in Kirby Hill and Boroughbridge. To facilitate this a footway link will need to be created from the site to join up with the wider highway network in Kirby Hill and Boroughbridge which stops some 350 metres short of the site. The LHA cannot accept the dismissive statement in 4.2.5; it is the view of the LHA that walking can be a viable means of transport to the site. Proposals to deliver the footway link to make walking viable should be included within the proposals.
18. The objectives of the TP contained in Section 3 need amendment. There are statements which are in conflict with other sections of the TP. This needs to be addressed.
19. The limited offer provided by scheduled bus services is not reflected in the TP. This needs to be amended. References to rail travel also need to reflect the lack of any opportunities for rail travel to be a viable travel choice.
20. The descriptions in Section 5 need to be amended to clarify the needs for internal pedestrian and cycle routes. Pedestrian routes will be needed for customers and staff. The only cyclists on site will be staff.
21. Internal delivery routes from the B6265 access will also need to be incorporated.
22. The level of staff parking proposed (10 No at paragraph 5.3.5) appears to be low and should be justified. Allowance will need to be made for shift changes where there is the potential for two shifts to be parked on site together.
23. There appear to be no proposals for any signing of the B6265 access on the Local highway network.
24. There is confusion in the timing of the initial staff survey; paragraph 6.1.3 is in conflict with later paragraphs eg 8.1.

25. As this is a new proposal where all staff will be new to the site it is possible for the conditions of service to include measures to control travel to site; has this been considered? Much of the proposals in 7.2 will be delivered too late for meaningful travel choices to become the established norm.
26. Similarly the timing of the staff bus is considered too late to establish sustainable travel choices. Boroughbridge should be included in the staff bus route.
27. It is unclear who will provide the personal travel planning?
28. Please define how regularly the cycle parking provision will be reviewed. It is likely summer usage will exceed winter usage and the LHA would not want a review to remove parking spaces used seasonally. Similarly the review period should not be so long that cyclist are deterred by a lack of parking.
29. Whilst it is accepted that this is a framework TP there are several items in Section 7 which are so generic they are inappropriate for the site's location.
30. The targets in Section 8 need amendment. They do not take account of the potential mode of travel nor do they provide SMART targets. The modal shift targets do not add up nor is there any modal shift for walking or bus. There is also reference to Applegreen preparing the final TP. Given that all TPs are evolving documents it is not possible for a final TP to be prepared.
31. In section 9 the timing of the initial survey needs to be consistent.
32. Section 10 which covers Resourcing and Monitoring again contains inconsistencies. These need to be addressed. It is the LHA's view that the provision of the staff bus should be available from the opening of the MSA; it will need to be fully funded. Given the size of the travel plan fund proposed, attempting to fund it as an add-on would decimate the funds available for any other initiatives.
33. In conclusion the TP will need to be amended to remove inconsistencies, introduce walking as a viable means of transport, introduce travel planning as a part of the recruitment process, introduce a staff bus before travel patterns become established and identify targets which meet the SMART test.

Access to the site from the local highway network (LHN)

34. The LHA's case for a rear access to the site to serve a MSA located north of the B6265 is well recorded, particularly in document NY1-2 Section 6 of the documents submitted to the conjoined public Inquiry for MSAs on the A1. This position has not altered. The key elements are:
 - Without rear access all journeys for staff and deliveries must be via the A1(M). From the northern point of Kirby Hill the round trip would be some 25Km to a site less than 1Km away.
 - Without a pedestrian and cycle rear access there are no opportunities for staff to consider using these forms of travel.
35. The application proposes a rear vehicular access for vehicles in the south west corner of the site, ie the most remote from Kirby Hill. The applicant indicates that this will accommodate staff travel by motorised vehicles subject to suitable security measures being in place to prevent unauthorised direct access between the MSA and the local highway network. The LHA will require this facility to be available for deliveries to prevent un-necessary road miles by deliveries from local sources.

36. The existing footway provision which links Kirby Hill with Boroughbridge stops some 350m south of the A168, B6265 roundabout. There are provisions for cyclists to safely negotiate the A168/ B6265 roundabout.
37. There is no proposal to extend this footway or make provision for pedestrians and cyclists either in the facilities at the rear access. It is the view of the LHA that extension of the footway to the rear access and provision for pedestrians and cyclists are all required for the site to comply with sustainable policies.

Impact of construction

38. The developers will need to show the LHA how construction traffic will be accommodated on the local highway network during the construction of the MSA. It will not be possible to take immediate access to the site from the A1(M) and consequently the LHA needs to be satisfied that this matter has been considered. It may be that volumes of construction traffic will have a material impact on the network. Because of the potential impact the LHA will need to be satisfied that these matters have been considered in the consideration of the application and not left to be resolved during condition discharge.

I am happy to meet with the applicant and his transport consultants to discuss these matters in more detail if it will assist in moving matters forward. I await additional information to address the issues raised and assist me in reaching a position to issue a formal recommendation on the application.

PAM JOHNSON
Team Leader Transport and Development