

3<sup>rd</sup> February 2012

Mr J Saddington  
Planning Department  
Hambleton District Council  
Civic Centre  
Stone Cross  
Northallerton, DL6 2UU

Dear Mr Saddington,

**Stillington Road, Easingwold – Proposed Retail Development  
Objection to Planning Application 11/02245/FUL by Retail Development Partnership**

In relation to the above submitted application which seeks planning permission for a 2,223m<sup>2</sup> supermarket and five residential town houses on land to the north of Stillington Road, Easingwold.

I have visited the site and undertaken a detailed review of the submitted Transport Assessment (dated 11 October 2011 prepared by Development Transport Planning) and wish to raise the following concerns and objections to this application.

**Supermarket Vehicular Access and Highway Safety**

There are several issues associated with the proposed vehicular access junction to the store which is shown on Development Transport Planning (DTP) Drawing No.61013-004 within their Transport Assessment (TA) – a copy of this plan is attached for reference purposes.

Shared Use

It is proposed that the vehicular access will be utilised by all vehicles ranging from customers cars to large articulated HGV's. This clearly raises highway safety concerns with respect to conflicting movements both between different vehicle types as well as pedestrians and cyclists. This concern is even more greatly emphasised when considered alongside the highway geometry proposed and the swept path requirements of a HGV (this is discussed further in the next item). In order to eliminate these conflicts it will be necessary to provide two separate access points.

It is compelling to note that this critical highway safety issue is shared by the applicant's consultants:

- Section 5.0 of the Design and Access Statement (prepared by WCEC Architects and dated October 2011) where three different layout options were considered and for options 1 and 2 it is stated that "*to avoid conflict between customers and service vehicles two site entries would be required*" (my underlining). Clearly this concern was not carried through the chosen preferred solution; and
- Paragraph 3.4 of DTP's TA states that "*the layout of the service yard will enable articulated delivery vehicles to turn without encroaching into customer areas*" (my underlining). Again it is evident from this paragraph that the consultant is concerned about HGV manoeuvres conflicting with cars and yet, as proposed, this is precisely what will occur at the single site access junction day in day out.

### Junction Geometry and HGV Tracking

Firstly there is some confusion regarding the proposed width of the store access road as it is shown as 7.5m on the enclosed DTP drawing but paragraph 3.4 of their TA states that “*the proposed access road will be 6m wide*”. This requires clarification as the access road width will impact on:

- Adjacent property land boundaries – in particular house number 1 Leasmires Avenue for which the proximity of the proposed store access road is already extremely tight and bearing in mind the applicants are proposing this road is used by HGV's;
- Existing trees fronting the Site – whilst not shown on DTP's drawing, having visited the site, the access arrangements shown will definitely require the removal of at least one mature tree (which may or may not have a TPO) and the impact that any remaining trees could have on visibility splay requirements is not shown; and
- Potential third party land – neither the TA nor site access drawing shows the extent of the adopted highway boundary and because the access is proposed so close to the eastern boundary of the site, there is some doubt whether or not the junction can be constructed without requiring third party land not in the developer's control.

Assuming that the more generous 7.5m width is proposed (as shown on DTP's drawing) we have undertaken a swept path analysis exercise of an articulated HGV using the Auto Track software – enclosed as Optima Drawing No.12004-ATR-01. It is acknowledged in paragraph 3.4 of the TA as well as on drawings shown in the Design and Access Statement that such a vehicle will be required to access the site although it is noted that no swept path analysis has been completed at the Stillington Road junction.

Optima Drawing No.12004-ATR-01 shows a series of tracks for a number of different HGV manoeuvres into and out of the proposed store access. These tracks show that a vehicle turning left into the site or right out of it will either:

- Need to drive onto the opposite side of Stillington Road i.e. facing oncoming traffic;
- Utilise the full width of the store access road if they are able to i.e. not being used by a customer vehicle at the time;
- Over-run kerbs onto the footway; or
- A combination of all three above.

Clearly none of the above outcomes are acceptable on highway safety grounds and will result in unnecessary and potentially dangerous vehicular and pedestrian conflicts.

At paragraph 6.16 of the TA it states that “*it is anticipated that delivery vehicles will approach from the A19 via York Road and so a reduced radius is appropriate on the eastern side*” (my underlining). Evidently it cannot be guaranteed that some service vehicles will not approach from the east and therefore Optima Drawing No.12004-ATR-01 also shows swept paths for a HGV turning right in and left out of the site. It can be seen that such manoeuvres will lead to an even greater adverse impact on Stillington Road highway safety.

The findings/results of the swept path analysis have been verified up by an on-site exercise undertaken on 11<sup>th</sup> January 2012 when an articulated HGV undertook the same manoeuvres into and out of the existing site access on Stillington Road. This exercise was photographed and videoed and the Council is welcome to request sight of this footage should they require it.

### Traffic Speed and Visibility Splays

DTP have based the proposed junction visibility splay requirements on the existing 30mph speed limit. On site observations are such that vehicle speeds may be higher than this, particularly bearing in mind the straight alignment of Stillington Road and the lack of any traffic calming.

It is highly preferable and in fact recommended in Manual for Streets (MfS) for visibility splays to be based on actual 85<sup>th</sup> percentile speeds. It appears that no speed surveys have been undertaken and visibility splays have been incorrectly based on an assumed adherence to the prevailing speed limit. Clearly, the lack of such information brings into question the visibility splay requirements of the proposed store access.

### Ghost Island Right Turn Lane

The DTP Site Access junction indicates that the development is to be served from a simple priority T junction. Priority junctions should be designed in accordance 'TD 42/95 - Geometric Design of Major/Minor Priority Junctions'.

Figure 2/2 contained within TD 42/95 identifies that simple priority junctions should not be used where the minor road flows exceed 300 vehicles per day (two-way) and that under such circumstances a ghost island right turn lane layout should be provided. The table on page 16 of DTP's TA shows that the development site is estimated to generate 3,605 two-way daily trips on a weekday. This represents a figure which is over ten times that recommended in TD 42/95 and yet DTP's TA/layout shows no provision and/or consideration for a right turn lane into the site from Stillington Road.

As it stands the proposed simple priority site access junction layout does not accord with national design guidance i.e. TD 42/95 and no justification is provided in the TA for such a departure.

### Proximity to adjacent Leasmires Drive Junction

Due to the proposed location of the supermarket access junction at the far eastern boundary of the site it will lie just 33m away from the adjacent Leasmires Drive junction - as shown on the attached Optima Drawing No.12004-ATR-01. North Yorkshire County Council's Residential Highway Design Guide recommends that for a local distributor road, junctions on the same side of the road should be spaced at least 60m apart i.e. a distance approximately double what is actually provided on DTP's site layout plan.

Clearly the proposed site access layout is in breach of the highway authorities own design guidance and represents a serious highway safety concern, in particular in relation to:

- Potential conflicts/collisions between left turning vehicles from the supermarket access and right turning vehicles from Leasmire Drive;
- Blocking of visibility splay to the left (east) from the proposed site access junction;
- Blocking of visibility splay to the right (west) from Leasmire Drive;
- Potential conflicts/collisions arising when a vehicle turning left into Leasmire Drive starts signalling left prior to the Supermarket access and a vehicle departing the supermarket pulls out into Stillington Road on the false assumption that the vehicle will turn left into the supermarket site;

- Potential conflicts/collisions arising when a vehicle turning right into the new supermarket starts signalling right prior to Leasmires Drive and a vehicle turning right out of Leasmires Drive pulls out into Stillington Road on the false assumption that the vehicle is turning right into Leasmires Avenue.

This issue is not raised or discussed in the TA.

#### Road Safety Audit, Topographical Survey and Bus Stop

In consideration of all of the above points it would be expected that a Stage 1 Road Safety Audit is undertaken of the proposed site access arrangements in accordance with national guidelines. No reference is made to a Road Safety Audit being completed. If one were to be completed it is anticipated that it would raise many if not all of the above highway safety concerns.

Additionally it is noted that all design work has been undertaken on OS mapping and not on a topographical survey. In conjunction with all of the aforementioned design and highway safety concerns this raises further question marks as to whether a suitable/appropriate access can actual be provided within the land and highway available.

Finally the proposed site access requires the relocation of the existing eastbound bus stop on Stillington Road. This is shown on DTP's drawing but there is absolutely no reference to this within the text of the TA and whether or not any discussions have been held with the Council or bus operators regarding the acceptability of this and what if any new infrastructure is required. In the absence of any such information the deliverability of the bus stop relocation must be questioned and therefore the deliverability of the site access itself which relies on this relocation.

#### **Residential Vehicular Access, Highway Safety and Car Parking**

There are several issues associated with the proposed residential vehicular access junction which is shown on Development Transport Planning (DTP) Drawing No.61013-004 within their Transport Assessment (TA) – a copy of this plan is attached for reference purposes.

#### Junction Location/Geometry

DTP Drawing No.61013-004 shows a proposed access to the five townhouses on Stillington Road directly opposite the existing Ingleton Drive junction. The access would also sit directly in-between the relocated eastbound bus stop and the existing westbound bus stop. Furthermore this length of street is currently used for on-street parking. Clearly the competing conflicts between the bus stops, the new site access, parked cars and vehicles turning into and out of Ingleton Drive raise highway safety concerns with respect to potential collisions.

Furthermore no visibility splays are shown along Stillington Road from the proposed site access. A minimum set back distance of 2.4m is required and based on the existing footway width this is more in the region of 1.8m as shown. Visibility provision is therefore substandard and compromises highway safety.

### Impact on On-Street Parking and existing ETC Business

The location of the residential site access on Stillington Road is currently used by several vehicles (not least customers to the nearby ETC business) throughout the day for on-street parking. The TA makes no reference to the fact that the scheme proposals will clearly impact on this existing on-street parking and how this impact will be dealt with. How many vehicles will be affected? Where will they park in the future? What will be the effect on existing businesses such as ETC? Will any Traffic Regulation Orders restricting on-street parking be required? Has this been discussed with the Council and again what would the impact be on existing users?

From the information available all of these questions remain unanswered and are critical to base any decision on with respect to the residential site access arrangements.

Furthermore the ETC business currently has a servicing access immediately to the east of the building and it appears that the current proposals give no consideration to how this will operate in the future and if suitable visibility is provided. This also needs addressing ahead of any planning decision.

### Internal Residential Car Parking

Paragraph 3.8 of the TA identifies that the proposed Access will lead to a separate parking court for the town houses and the layout given in WCEC's Design and Access Statement (DAS) shows that 7 spaces will be provided. Whilst it is acknowledged that the County Councils standards stipulate a maximum of 1 parking space per dwelling for two bedroom properties plus 1 visitor space per 5 units i.e. a total of 6 spaces in reality some occupants will own 2 cars. Therefore this will create an even greater demand for on-street parking than exists now and places even greater focus on all of the concerns referred to in the previous item.

Additionally there is an even greater concern. The WCEC layout given in the DAS shows that there is no turning arrangement provided within the parking court and therefore any vehicle entering, which is unable to park, will be required to reverse back out onto Stillington Road. This is a significant highway concern which would result in vehicle conflicts and potential collisions.

### **Traffic Counts**

Optima commissioned an independent traffic survey company to undertake a count at the existing York Road/Long Street/Stillington Road junction. This count was completed on Wednesday 11 January 2012 during the morning and evening peak periods of 07:30 to 09:30 and 16:30 to 18:30 respectively – a copy of the count data is attached. A comparison of the resulting peak hour flows against those undertaken by DTP on Thursday 12<sup>th</sup> May 2011 (and summarised on their Figures 1 and 2) is given in the table below:

	AM Peak Hour (2-way approach flow)			PM Peak Hour (2-way approach flow)		
	2011 Count	2012 Count	Change	2011 Count	2012 Count	Change
<b>Long Street</b>	388	420	<b>+8.2%</b>	364	328	<b>-9.9%</b>
<b>Stillington Road</b>	276	305	<b>+10.5%</b>	256	258	-
<b>York Road</b>	243	287	<b>+18.1%</b>	288	287	-

The above table shows that the traffic flows during the evening peak hour are generally consistent and nearly 10% lower on Long Street. However, during the morning peak hour period the recent 2012 surveys undertaken show 8%, 10% and 18% increases on the Long Street, Stillington Road and York Road approaches to the junction respectively.

It is therefore a concern that the traffic modelling undertaken within DTP's TA underestimates the traffic flows and hence the available capacity at the existing York Road/Stillington Road junction.

It is also noted that DTP's traffic counts do not cover a Friday market day when traffic flows on the highway network could be even higher.

### **Trip Generations**

Paragraphs 5.4 and 5.5 of the TA state that the TRICS database has been used to establish trip rates for the proposed supermarket and that they have used average trips (not 85<sup>th</sup> percentile) on the basis that the TRICS sites selected have similar characteristics and are representative. A detailed investigation into the TRICS sites has been undertaken which yields the following:

#### Weekday TRICS Sites

The following four TRICS sites shown in the Table under paragraph 1.16 in Appendix D of the TA have been used to calculate the weekday trip rate:

- Site reference CB-01-A-07 (Somerfield in Carlisle) – This Site is on a major route into the centre of Carlisle and therefore benefits from extensive bus services – approx. 16 per hour is stated in TRICS. By contrast the proposed Site in Easingwold has limited public transport accessibility with 2 buses passing the Site every hour, whilst a further 5 bus services per hour are available approx. 400m to the west. In our opinion the Site is therefore not comparable at all due to location, population catchment and the quantum of bus services which are available;
- Site reference DC-010A-17 (Sainsbury's in Sherborne) – The survey for this Site was undertaken in 2003. This data is 9 years old and therefore unreliable and unrepresentative;
- Site reference IA-01-A-01 (Co-op in Menai Bridge) – The Site benefits from extensive bus services – Approx. 15 per hour is stated in TRICS. In our opinion the Site is therefore not comparable due to the quantum of bus services which are available; and
- Site reference WS-01-A-11 (Sainsbury's near Pulborough) – The survey for this Site was undertaken in 2003. This data is 9 years old and therefore unreliable and unrepresentative.

#### Saturday TRICS Sites

The following four TRICS sites shown in the Table under paragraph 1.24 in Appendix D of the TA have been used to calculate the Saturday trip rate:

- Site reference DC-010A-17 (Sainsbury's in Sherborne) – The survey for this Site was undertaken in 2003. This data is 9 years old and therefore unreliable and unrepresentative;
- Site reference NY-01-A-01 (Somerfield in Northallerton) – The survey for this Site was undertaken in 2003 and therefore the data is 9 years old, is unreliable and unrepresentative. Furthermore this Site has been surveyed three times under TRICS – see attached TRICS datasheets. In 2003 as Somerfield, in 2007 as Sainsbury's and in 2009 as Sainsbury's. The two way trip rates at these three surveys differ between 8.813 in 2003,

Mr J Saddington - 3<sup>rd</sup> February 2012

Stillington Road, Easingwold – Objection to Retail Development

17.261 in 2009 and 18.174 in 2007. DTP have removed the highest trip rate claiming that they are using the newest survey, whilst they have kept the oldest and lowest trip rate in the survey. Using this methodology has therefore reduced the trip rate used for the Saturday peak;

- Site reference NY-01-A-05 (Sainsbury's in Northallerton) – As discussed above Site NY-01A-02 (Sainsbury's in Northallerton) was removed from the survey; and
- Site reference WS-01-A-11 (Sainsbury's near Pulborough) – The survey for this Site was undertaken in 2003. This data is 9 years old and therefore unreliable and unrepresentative.

It is therefore evident that the TRICS database sites used by DTP in their TA are out of date and unrepresentative. As such they are unreliable and seriously undermine the robustness and viability of the traffic flows that DTP have estimated the proposed supermarket will generate. Consequently none of the junction traffic modelling undertaken in the TA i.e. the impact of the development on the highway network can be relied upon.

In summary we have significant concerns regarding highway impact, site access, highway safety, pedestrian safety, car parking and the accuracy of the traffic surveys and trip rate methodologies contained within the TA prepared to support the application. As such the Council cannot be in a position to support the development and we trust that you will take our objections fully into account when considering this planning application.

Yours sincerely



**Philip M Owen BEng (Hons) CEng MICE MIHT**

Director on behalf of

**Optima Highways and Transportation Ltd**

Enc: DTP Drawing No.61013-004 – Proposed Site Access  
Optima Drawing No.12004-ATR-01 – Site Access Swept Path Analysis  
York Road/Stillington Road Junction - Wednesday 11 January 2012 Count Data  
Supermarket TRICS Datasheets