Brawby
Malton,
North Yorkshire

Highways and Transportation
Area 4 - Pickering Office
Beansheaf Industrial Park
Tofts Road,
Kirby Misperton
Malton,
North Yorkshire
YO17 6BG

6 February 2016

To whom it may concern,

Consultation response from Simon Thackray

RE proposed experimental 7.5T weight limit across the Norton level crossing.

Exemptions:

There should be NO exemptions for ANY vehicles in excess of 7.5 tonnes travelling over the Norton level crossing *apart from* emergency service vehicles (those actually responding to a 'blue-light' emergency), and vehicles delivering to, and collecting from, businesses located on Castlegate and/or Sheepfoot Hill, Malton (excluding Morrisons supermarket, which receives deliveries via Railway Street which is unaffected by the restriction).

However, it is worth noting that the proposed HCV restriction will not achieve air quality improvements, across all monitoring locations in the Malton AQMA, to prevent Malton air quality from breaching the legally binding limit for the concentration of Nitrogen Dioxide in the future. This HCV restriction, together with ALL the other *'complementary measures'* of the Brambling Fields scheme, will not achieve this objective.

I have studied the documentation and reports relating to the Brambling Fields junction upgrade scheme, together with the interdependent Malton Air Quality Action Plan 2012, and conclude that the architects of the BF scheme made a serious error at the outset and misinterpreted the real impact of the scheme by focusing attention on average reductions in traffic and Nitrogen Dioxide on Castlegate and Butcher Corner, Malton, instead of studying the individual impacts on ALL the roads in Malton. The devil is in the detail.

Air quality will improve on some roads as a result of the HCV restriction. However, air quality will **deteriorate** (be made worse) on other roads, and lead to the sustaining of the current breach of the legally binding limit for the concentration of Nitrogen Dioxide.

The Brambling Fields scheme was supposed to free-up 'space' (both *air space* and road and junction capacity) in order to accommodate the development aspirations of the Ryedale Plan. This was a miscalculation and an unachievable objective based on the Brambling Fields scheme data and its so-called 'complementary measures'. A cursory glance at the figures (MAQAP 2012 Table 11. attached) makes this clear and I invite officers and members of RDC and NYCC to study the information I have submitted.

Malton, Norton and Old Malton cannot accommodate the 'desired' level of development prescribed by the Ryedale Plan, without the creation of additional junctions allowing access to, and egress from, the A64 at Broughton Road and Musley Bank (eastbound), and a new bridge over the River Derwent allowing direct access to and / or bypass of, Norton and Old Malton i.e. there must now be a fully accessible northern and southern (circular) bypass just to accommodate the current level of development approvals and traffic.

If the councils (RDC and NYCC) carry on regardless, and continue to disregard the available evidence and facts, the health of the public will be harmed and individual council members will, sooner or later, be held responsible and liable for personal injury. The reports and documents to which I refer in my attached notes were prepared by Ryedale District Council and Jacobs and are all available online (with the exception of the Malton Air Quality Steering Group meeting minutes which are available on request from RDC).

I have tried to make everything simple to read and cut out much of the superfluous fluff. If you don't understand any of the figures I have presented please contact me and I will do my best to help you.

Yours sincerely,

Simon

The Malton Air Quality Action Plan 2012
http://www.ryedale.gov.uk/attachments/article/196/Malton_Air_Quality_Action_Plan_jan2012.pdf

RDC 2016 Air Quality Annual Status Report (ASR)
http://www.ryedale.gov.uk/attachments/article/196/2016_Air_Quality_Status_Report.pdf

Proposed HCV Restriction - Predicted Impacts Paul Hunt RDC February 2016.
http://ryedale.net/wp-content/uploads/2016/03/Proposed-Heavy-Commercial-Vehicle-Restriction-over-Norton-Level-Crossing-11.02.16.pdf

Jacobs - August 2016 - Ryedale District Council
Local Plan Evidence Base Modelling Highway Impacts of Local Plan Developments in Malton, Norton and Pickering.
http://www.ryedaleplan.org.uk/attachments/article/374/Highway_Modelling_Malton_Norton_Pickering_August_2016.pdf

Consultation response from Simon Thackray.

Supporting documents to be read in conjunction with letter dated 6 Feb. 2017.

RE ‘experimental’ 7.5 tonne weight restriction across Norton level crossing.

Malton Air Quality Action Plan 2012 (RDC)

Ryedale District Council

Table 2.5 Results of Nitrogen Dioxide Diffusion Tubes (2007 to 2011)

Site ID	Site Type	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu g/m^3$				
			2007 (Bias Adjustment Factor =0.82)	2008 (Bias Adjustment Factor = 0.78)	2009 (Bias Adjustment Factor = 0.82)	2010 (Bias Adjustment Factor = 0.85)	2011 (Bias Adjustment Factor =0.84)
9	Yorkersgate (1): Malton	Y	45	43	42	45	46

LAQM Annual Status Report 2016 (RDC)

Ryedale District Council

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) [1]	Valid Data Capture 2015 (%) [2]	NO_2 Annual Mean Concentration ($\mu g/m^3$) [3]				
					2011	2012	2013	2014	2015 (figure in brackets difference between 2014 and 2015 annual mean concentration)
NAS9 (In AQMA) Yorkersgate 1, Malton	Kerbside	Diffusion Tube	100	100	46	46	43	43	44 (+1)

Bias adjusted NO2 level figures for Yorkersgate 1 (AQMA site 9). (Source RDC). Monitor located on Yorkersgate opposite Saville Street.

(Legally binding limit for NO2 = 40 micrograms per cubic meter of air).

The average concentration of NO2 on Yorkersgate (past 9 years) = **44.11**

2015 **44**
2014 43
2013 43
2012 46
2011 46
2010 45
2009 42
2008 43
2007 45

The implementation of the Brambling Fields complementary measure (Malton Air Quality Action Plan AP2a) to restrict HCV movements across the Norton level crossing will:

1. increase the number of HCV movements in Yorkersgate **+132%.**

2. increase HCV movements on Old Maltongate **+89%.**

(Source: Malton Air Quality Action Plan 2012, Table 11 below - RDC).

Table 11: Predicted Changes in Butcher Corner Junction Traffic Flows arising from Action Plan Measures 1 & 2a-2c*.

	Without Action Plan Measures		With Action Plan Measures		Difference	
Road	All Vehicles AADT	HGV AADT	All Vehicles AADT	HGV AADT	All Vehicles AADT	HGV AADT
Yorkersgate In	4212	65	5312	151	26%	132%
Yorkersgate Out	4840	191	2163	169	-55%	-12%
Castlegate In	7320	191	4473	8	-39%	-96%
Castlegate Out	8776	214	8128	13	-7%	-99%
Wheelgate In	7148	253	3209	85	-55%	-66%
Wheelgate Out	5125	109	2663	78	-48%	-28%
Old Maltongate In	4033	55	1823	104	-55%	89%
Old Maltongate Out	3972	50	1863	88	-56%	76%
Totals						
In	**22713**	**564**	**14817**	**348**	**-35%**	**-38%**
Out	**22713**	**564**	**14817**	**348**	**-35%**	**-38%**

** Modeled changes also based on impact of Castlegate Lane Reduction which is a measure to be subject to further consideration*

The increase in HCV movements will increase the amount of vehicle emissions.

The RDC report by Paul Hunt of February 2016 (see below) prepared on behalf of NYCC, and using formulae provided by NYCC, predicts an overall ***INCREASE*** in traffic passing through Malton AQMA as a direct result of the HCV restriction over Norton level crossing.

This predicted outcome will surprise many people because it has always been claimed that the Brambling Fields junction scheme would reduce the number of vehicle movements through the Malton AQMA by around a third (33%).

Having closely studied all the available evidence, I believe the claim was, and is, wrong and was a major error by RDC officers.

Continued on next page:

Proposed Heavy Commercial Vehicle Restriction over Norton Level Crossing - Predicted Impacts on Pollutant Emissions

Report by Paul Hunt, RDC, February 2016

Road Link		All Vehicles	Car	LGV	OGV1	OGV2	Bus/Coach	Mtr/cycle
Castlegate (B1248)	Origin	6311	5190	826	133	96	35	31
	Destination	4051	3246	540	132	89	17	27
	TOTAL	10362	8436	1366	265	185	52	58
Church Street (B1248)	Origin	7520	6203	932	169	99	61	56
	Destination	7319	6026	930	152	97	63	51
	TOTAL	14839	12229	1862	321	196	124	107
Norton Road	Origin	1102	915	115	21	1	28	22
	Destination	3563	3036	403	39	10	44	31
	TOTAL	4665	3951	518	60	11	72	53

Table 1: Summary of Norton Level Crossing Traffic Data - 12 hour Count , 7 October 2016

Road Link		All Vehicles	Car	LGV	OGV1	OGV2	Bus/Coach	Mtr/cycle
Castlegate (B1248)	Origin	6772	5880	826	0	0	35	31
	Destination	4175	3591	540	0	0	17	27
	TOTAL	10947	9471	1366	0	0	52	58
Church Street (B1248)	Origin	7846	6797	932	0	0	61	56
	Destination	7665	6621	930	0	0	63	51
	TOTAL	15511	13418	1862	0	0	124	107
Norton Road	Origin	1120	955	115	0	0	28	22
	Destination	3637	3159	403	0	0	44	31
	TOTAL	4757	4114	518	0	0	72	53

Table 2: Adjusted Traffic Data used to Simulate Emissions Impact of OGV1 & OGV2 Prohibition

NB: traffic passing through the Malton AQMA will ***increase*** as a result of the HCV restriction over Norton level crossing. (Formula supplied by NYCC below).

Proposed Heavy Commercial Vehicle Restriction over Norton Level Crossing - Predicted Impacts on Pollutant Emissions

Report by Paul Hunt, RDC, February 2016

3.7 The EFT was then run to generate outputs of emissions using flows and fleet composition input data that excluded OVG1 (2 & 3 axle rigid commercial vehicles) and OVG2 (articulated commercial vehicles with 3 or more axles) classes, thus simulating an enforced/complied with HCV ban applicable to these vehicles. Buses and coaches were not excluded. This was done for the same four traffic speed values (16, 24, 32 & 48kph). The data inputs were also adjusted to account for the increased flow of cars that may arise because of the additional road capacity created by a HCV restriction. This assumed that for each OGV1/OGV2 class vehicle removed an additional 2.3 cars would use the crossing. The figure of 2.3 was provided by Jacobs and is derived from combining passenger car equivalent (PCE) figures of 1.9 for the OGV1 class and 2.9 for the OGV2 class.

Further reference to the predicted increase in vehicle movements in the Malton AQMA below:

RDC LAQM Annual Status Report 2016 (Callum Brown) below:

- The prohibition of both rigid axle and articulated HCVs from using the crossing would result in significant reductions of NO_x (Nitrogen Oxides) and other road traffic pollutants along the three road links to the crossing. These roads include access to Butcher Corner which is part of the AQMA. Further this reduction would still apply

even when allowance is made for increased car movements that are assumed would take up the increased capacity created by an HCV restriction.

Key facts:

Traffic numbers / movements in the Malton AQMA are predicted to increase with the implementation of the HCV restriction over Norton level crossing.

The level of NO2 is expected to reduce at some locations in the AQMA, but HCV vehicle movements are predicted to increase on other roads (in particular Yorkersgate and Old Maltongate) which could lead to an increase in NO2 concentration on Yorkersgate – which is already in breach of the law.

Jacobs' report, August 2016

Whilst it does not address Malton's air pollution problem directly, the Jacobs' report of August 2016 states that all the development scenarios proposed in the future site allocation document, which forms part of the Ryedale Plan, will result in all junctions in Malton being over capacity:

> 7.4.4 "*Butcher Corner will be over capacity in each scenario as a result of the complementary measures to be implemented."*