

Planning & Diversification Consultants

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Dear Tom

### MALTON GRANGE COUNTRY PARK - TRAVEL PLAN UPDATE 2019

Change of use of land for the siting of 8no. timber clad holiday cabin-style caravans with associated access track and landscaping to form an extension to Malton Grange Country Park, at Land South of Malton Grange Country Park, Amotherby Lane, Amotherby, Malton, North Yorkshire

### Introduction

We are in receipt of the formal consultation response of North Yorkshire County Council Highways Authority dated 28 June 2019. Please regard this letter and its contents as an 'Updated Travel Plan' for Malton Grange Country Park. This letter should be read in conjunction with the original Travel Plan by Local Transport Project, dated October 2017 (already submitted). This letter also gives some further consideration to the transport implications of the application proposals, having regard in particular to Section 9 of the NPPF, and to other sections of the Framework.

The Highways Authority has requested information as to what measures have come about and been implemented as a result of the recommendations in sections 8 and 9 of the Travel Plan, 2017, to see how the promotion of sustainable transport modes has been encompassed and if any further measures are to be pursued, or existing measures refined, in line with the underlying advice contained within Chapter 9 of the NPPF.

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#### The Period 2020-2021

The Covid-19 had a significant impact on the holiday caravan park industry and the country as a whole. There was a requirement for holiday caravan parks to cease operation, therefore for many months throughout 2020 and into 2021, Malton Grange was not open to customers. Give this period of suspension, it is considered that the contents of the 2019 updated Travel Plan remain up to date.

### The NPPF, 2021

Whilst we note that Section 9 of the NPPF seeks to promote sustainable transport and mitigate against any significant impacts of development on highway safety, it also states that local planning authorities should only prevent or refuse development on highways grounds if there would be unacceptable impacts on highway safety. We would also highlight that other parts of the Framework should also be given due weight in the overall planning balance.

For example, paragraph 3 of the NPPF, states: -

"The Framework should be read as a whole".

Furthermore, Section 2 identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, with three overarching objectives set out: economic, social and environmental. It is therefore the case that the access and transport implications of a development proposal, and in this case perceived concerns about car dependency, form only one indicator of the overall sustainability credentials of a particular development.

We would also draw attention to Section 6 of the NPPF, which seeks to build a strong, competitive economy. In particular, paragraph 84 offers clear support to sustainable rural tourism, and paragraph 85 states: -

"Planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)".

The significance of paragraph 85 is that it recognises the clear difficulties faced by certain businesses and application sites in rural areas in relation to sustainable transport. Ryedale is a rural district. It is thus inevitable that some development sites and existing businesses will not be in locations well served by public transport. Moreover, despite a stated desire to take up opportunities to make sites and businesses accessible by more sustainable modes of transport, such opportunities

may be limited. This limitation should not be determinative in the overall planning balance.

### What has the business done since 2017 to try to promote sustainable travel?

Section 8 of the Travel Plan, 2017 set out measures to promote walking, cycling, the use of public transport and car sharing. As stated, the Covid pandemic has exerted a 18-24 month impact on the holiday park, therefore despite the 5 year period since the original travel plan, it is considered that the document remains embryonic and its stated objectives remain fit for purpose and not in need of specific updating. It is difficult to monitor progress because the park has been closed for certain periods.

The business is a holiday park. People come to relax, get away from the stresses and strains of everyday life and to switch off. Malton Grange offers an environment within which customers can achieve these objectives. Not everyone wants or chooses to travel during their stays. Some simply want to stay put in their accommodation and read books and use the hot tubs etc. It is thus a matter of fact that other than the key trips to and from the park, some customers may not be travelling regularly during their stay. However, for those customers who are travelling about during their stays, the business does take this issue of stainable transport seriously and has made efforts to highlight to its customers the importance of both considering and using other, more sustainable forms of transport.

### **Travel Plan Co-ordinator**

Malton Grange Country Park now has a designated Travel Plan Co-ordinator who is responsible for the implementation, maintenance, review and updating of the Travel Plan and its maintenance.

#### **Welcome Packs**

All customers are issued with a Welcome Pack. This contains a specific section about local travel options designed to promote increased awareness, consideration and use of sustainable transport. Details of local bus routes and a timetable are provided. Cycling is also encouraged. See Appendix 1 which comprises an extract from the welcome pack.

#### Walking

The 2017 Travel Plan identified that there are several public rights of way in the locality, including opportunities to use these local footpaths to access the local pub / restaurant at nearby Amotherby on foot, particularly in the summer months. There is a reasonable take up of this option by customers.

Despite being located within reasonable walking distance of Amotherby, the use of Amotherby Lane by pedestrians to access services and facilities in Amotherby is unfortunately limited. Its use is discouraged because of a combination of the speed of traffic, the bends in the road and the lack of a footpath.

## Cycling

Many customers bring their bicycles with them and a cycle stand and cycle wash facility are already provided within the park. Printed pamphlets of cycle routes within the district are also made available to customers on request and are on display and available to take away from the customer reception building. As a further measure to encourage the use of bicycles, the business is in the process of purchasing some secure bike stores to be located next to the customer reception building. A planning condition could be used to secure their provision.

# **Public Transport**

Yorkshire Coastliner currently provides the 194 bus service through Amotherby, providing daily services to Malton. Currently this service turns around at the BATA Mill in the village to return back to the B1257. The Travel Plan Co-ordinator is currently in active discussions with Coastliner about extending this service to turn around within the Country Park, to pick up potential customers. It is likely that the busier and more time-critical work journey services could be excluded, but the services during later morning and afternoon could be extended. Details of the existing bus service are provided within the Welcome Pack and there is a reasonable take up by customers. The business is also considering the provision of a mini-bus shuttle service to the bus stop at Amotherby and / or to Malton (to be provided on a certain number of days and / or when there are specific events being held).

### **Car Sharing**

This is a more difficult option to encourage and monitor, however the business is taking steps to research this option further and is planning to update its Welcome Pack to provide more information about this option.

# **Electric Car Charging Stations**

The park has installed 2(no.) electric car charging stations (see photo below).



# **Continuing / Future Measures**

Over the next 12-24 months the business intends to undertake the following actions / measures to continue to promote and monitor its green travel plan objectives: -

- 1. Explore extension of existing bus service provision from Amotherby to Malton Grange Caravan Park;
- 2. Provide secure bike store facilities next to customer reception building;
- Explore provision of a minibus shuttle service to Amotherby, Malton and other destinations on certain selected days and / or when specific events are on.
- Update the Customer Welcome Pack to provide new and additional information (including measured performance of take-up of various sustainable travel options by customers).
- 5. Display of more visible information within the caravan park about sustainable transport options.
- 6. Commitment to continue to monitor and update the Travel Plan.

# Conclusion

The business takes its obligations in relation to the 2017 Travel Plan seriously, but Covid has had a significant impact. The business now has a designated travel Plan Coordinator and several measures and objectives set out in the 2017 Travel Plan have been rolled out, but progress has been hindered because of Covid. The business will continue to actively manage, monitor, review and update the key Travel Plan objectives.

It is also the case that the application proposals can deliver other sustainability outcomes which should be given due weight in the overall planning balance. We hope that this document demonstrates that the existing business and the current application proposals are by no means car dependent and that there is a clear existing and continuing commitment to embracing and delivering other sustainable transport options and choices.

Yours faithfully

## **Edwardson Associates**

## **Enclosures**

- Extract from Malton Grange Country Park Welcome Pack.
- Please also refer to previously submitted Travel Plan 2017