

[REDACTED]  
[REDACTED]  
Kirkbymoorside  
[REDACTED]

11th September 2024

Dear Ms Holgate,

**Re: Application Number 21/00518/MOUT - Mulgrave Developments Ltd and Crossco. Sylatech.**

We have now reviewed most of the dozens of past and recently submitted documents and as set out in our last letter we are making further detailed representations. We wish to reaffirm our serious planning **objections** to this application as contained in our letters dated 16th June 2023 and 17th August 2024 and further expanded upon and to which we have added more detail in this letter.

We note that Ryedale DC in their pre application advice in 2020, flagged that housing development in West Lund Lane was contrary to locational housing policies and contrary to the adopted development plan and it advised that this was a key issue that needed to be justified in any application. Now that we have had an opportunity to read the documents submitted over that last 4 years it is clear that the evidence provided by the applicant is weak, missing from the application in its entirety and at times contradictory. This is a matter we will come back to a number of times in this letter.

On job creation, the application merely "envisages" the creation of limited numbers of jobs but with no timescale or actual hard evidence that these can or will actually be created by any of the proposed extensions to Sylatech. Indeed in the planning statement (March 2021) para. 5.1 it states '*after the covid pandemic has passed...Sylatech expects multiple customers to require increased capacity...*'. However, nearly four years later such demand has not occurred and we have been reliably advised that the company has earlier this year made significant (circa 10%) redundancies within its workforce.

We can find no "economic credentials", based on sound evidence, from Sylatech, contained in the application other than hypothetical and conjectural models which carry virtually no weight when addressing a specific employers business at a specific location. However, In the Design Access Statement (February 2021) it states '*...whilst the Covid-19 pandemic has had an immediate impact on its staffing numbers, confidence remains that Sylatech will recover strongly and expects to see a growth of around 55 jobs over*

*the next 5 years'*. This statement provided by the applicant is not linked in any way to the delivery of the proposed extensions to the factory. Yet, nearly 4 years later there has clearly not been any growth in the numbers employed by Sylatech but a proven significant reduction. In the short note from Sylatech dated 2nd August 2024 the company attempts to justify why it has not delivered the growth it stated it was going to deliver within 5 years post the Covid-19 pandemic, and then moves the goalposts again. The continually changing statements from the company over the last 4 years cannot therefore be relied upon as evidence as to what employment growth will occur. History over that same period clearly demonstrates that the company has shrunk in 2024, long after any possible impact from Covid-19 can be used as justification.

There will be plenty of evidence available that could be provided by the applicant and that can be put into the public domain to properly demonstrate whether expansion on such a large scale is really needed and if it is over what timescale. No such evidence has been provided.

For a company that works in the aerospace and military markets, no mention has been made on what adverse impact on its current and future employment levels will occur through the introduction of automation, robotics and AI. Such issues will undoubtedly have a depressive rather than an inflationary nature on Sylatech's future establishment.

Also in para 5.1 the applicant states that it has insufficient space to expand. However, it is noted that the applicant has recently chosen to market its adjoining large property, "Heathfield", which has the clear ability to assist in creating additional floor space for commercial or office use and/or parking for visitors etc. The applicant has very recently altered the red line of the application but, no reasoning has been provided as to why the applicant is reducing its current coterminus land holdings at the same time as it is saying it needs space to expand. It also has within its ownership, and within the red line of the application, a levelled/cleared area south of the existing factory (partly used for some shipping containers). Yet at para 8.28 it states *'the only land on which Sylatech can expand is the land that is the subject of this planning application. This is a material consideration to which significant weight can be attached'*. Yet again, as in many parts of this application, this statement is fundamentally incorrect. As demonstrated above, it is not the only land that they can expand onto and of course "Heathfield" was originally part of the application. Infact their are contradictory red lines showing on the most recently submitted plans (27/06/24) so it is not possible to know what is in or out of the application site. The applicant has, in its own control, the ability to positively assist its own expansion plans but is currently actively choosing not to and, worse still, disposing of the abutting large "brown field" property it owns.

The amount of land allocated in the extant local plan for existing employment use by Sylatech is 6.77 acres (source Ellis Healey Architects Dec 2022 plan). However the

submitted Planning statement para 5.5 says the housing will deliver the necessary infrastructure including a new access and improvements to the highway. This raises several issues:-

- Firstly, the land take to deliver the proposed housing requires 2.20 acres of local plan allocated employment land to be given over to residential use **not used** for employment purposes. This uses over 33% of the employment land allocation which may well be required at some point in the future.
- Secondly, The 'new access and improvements to the highway are only needed if (i) 67 residential properties are built (ii) a new access onto West Lund Lane is warranted just to service 12 visitor parking spaces and the hypothetical 10 new jobs proposed if the outline phase 3 building is approved and ever built. If all 12 visitors and 10 employees arrive on site every working day of the year this does not justify, or require, a new entrance off West Lund Lane now or in the future, particularly when the applicants own Transport Assessment shows that the use of the existing Sylatech entrance adjoining the A170 remains well within its design capacity. (and noted and specifically commented upon by NYCC highways engineer (23.09.21)).
- Thirdly, The site plans submitted for the proposed commercial elements of the application clearly show the "access road" passing the visitor parking bays running northwards parallel with the existing factory and then turning east at the north end elevation of the existing and phase 2 factory buildings (para 5.9 figure 2 plan and in other later submitted plans). At para 5.13 the applicant states all staff and deliveries will be via their existing access onto the A170. This clearly demonstrates that access for up to a possible maximum of 22 vehicles (12 visitors plus 10 staff re phase 3) is deliverable without a new access being required.
- Fourthly, By not losing 2.2 acres of employment land to residential use or needing any new accesses or other wider highway improvements the applicant can, at a fraction of the currently identified abnormal costs, deliver its commercial aspirations through its own land and existing access.

Despite the proposal to build 67 units of residential housing on land **not allocated** in the local plan, it seems perverse that the applicant uses the "abnormal" costs to attempt to drive down the expected delivery of social housing. The abnormal costs of this site are high because the applicant has chosen to try to justify using a "green field" site in the countryside, that has not been allocated in the local plan, at a location that is not served by a useable two way highway, constrained by a narrow historic railway bridge and, that has been previously discounted by the council in its report from use for residential

purposes until such times as Sylatech activities cease on the adjoining land due to pollution concerns.

At paras 8.22 - 8.24 of the planning statement it sets out the discounted price of £360,000 the current land owners are prepared to sell to Sylatech for. It also states that Sylatech cannot proceed to develop their factory independently of the residential proposal because of the high "abnormal" costs associated with highway and bridge works and the landowner would not receive sufficient income to justify the permanent loss of farmland. If the factory expansion plan is actually needed due to the extra capacity from its alleged very large customer base, one has to assume that the business is, and will remain, profitable and those profits will grow commensurately to its expansion footprint. If it is however saying its current / future profits do not support buying heavily discounted land to deliver its factory expansion then the whole *raison d'etre* of its expansion and business plans are fundamentally flawed. As set out above the abnormal works are clearly **not** needed to deliver phases 1 - 3 as there are readily available alternatives to Sylatech (which they already control) that avoid the need for absurdly high abnormal costs in the order of £2.43 million (or £460,000 if the commercial element is built in isolation to any housing). If the applicant has agreed a '*discounted price*' with the current land owners they presumably have accepted that this does provide them with '*sufficient income to justify the permanent loss of farmland*'.

The letter from Mulgrave of 10.08.2022, says that even if the Sylatech expansion plans are brought forward in isolation, road and bridge works would still be required at a cost of circa £460,000 and that this delivers a land value of -£99,000 without the subsidy of the residential development. As mentioned above, this is simply not correct. No works are required to West Lund Lane or the bridge if Sylatech simply use their existing access and build a short length of access road (as already shown on their submitted expansion plans) running parallel to the west elevation of the existing and proposed phase 1 and 2 factory buildings. At this point it is shown to connect to their current land at the north elevation of the factory. The Mulgrave letter is, in our opinion, nothing more than a veiled attempt to get permission to build housing on land not allocated in the local plan for housing, where there is no proven need, on a green field site, in the countryside and at the expense of using land that is earmarked as potential future employment land for the existing employer.

Housing delivery locally over the years since the application was submitted has /is delivering in excess of 300 units. This meets, as a minimum, the number of units set out in the local plan. As set out in Development Plan policy SP1, future developments will be distributed in line with the settlement hierarchy. It states that Kirkbymoorside will be a **secondary focus for growth**. Evidence of a need for further housing in Kirkbymoorside is absent and has not been provided as part of the application. In the planning statement (para 8.9) it asserts that '*the local plan strategy document directs a significant*

*level of housing growth to Kirbymoorside and as the site lies partly on land zoned for development... additional housing in Kirbymoorside is not inappropriate in principle'. This is of course wholly incorrect on two fundamental aspects; (i) The strategy directs 10% of housing growth to Kirbymoorside, which is not 'a significant level', as 90% is to be allocated elsewhere. (ii) Around 66% (4.55 acres) of the land shown as residential in the application is **not** on land zoned for development and the remainder is zoned for employment uses by the existing employer. It is therefore unequivocally inappropriate in principle and in practice to allocate any of it for additional housing. At para 8.150 of the Planning Statement the applicant also states "*it is accepted that the proposed development will lead to the loss of greenfield land..the loss of this land...will whilst[sic] have a negative impact.*". By this statement alone the applicant fully accepts housing at this location is inappropriate and will have a detrimental impact.*

The planning statement attempts to set out the industrial processes that will be carried out in the buildings presumably, to try and demonstrate they can happily co-exist with the proposed and existing adjacent residential properties. The uses proposed by the applicant are:-

- Phase 1 - Building and testing of assemblies connected to the existing microwave facility
- Phase 2 - CNC machining ie - drills, mills, grinders, lathes,routers etc
- Phase 3 - Manufacturing and assembly operations

It is obvious that placing the buildings for all three phases of the application in such close proximity to existing properties in West Lund Lane, Parkers Mount (including roads off it) and Ings Lane, that it will increase pollution (noise and disturbance and smell) levels for the residential properties in those roads irrespective of any controls proposed, as the base line is that the existing residential properties current "neighbour" is an agricultural field, with the existing factory much further away. We have during our review of this application learnt, with grave concern, that the company has altered the method of casting at the site. This has not been highlighted in any of the reports within the application and, certainly not in the submitted planning statement, despite the company changing from plaster casting (gypsum based) to the changed method of Furan casting that is considerably more polluting than the plaster casting method which, until recently, was used at the factory. We understand, from a web search, that:-

"Furan is a colourless, flammable, highly volatile liquid with a boiling point close to room temperature. It is soluble in common organic solvents, including alcohol, ether, and acetone, and is slightly soluble in water. Its odour is "strong, ethereal; chloroform-like". **It is toxic and may be carcinogenic in humans.**"

The HSE state "Vapours arising during foundry processes are irritant to the eyes, skin and respiratory tract and are potential respiratory sensitisers. Absorption through the skin can lead to a toxic effect on the central nervous system."

Why has this not been highlighted in the planning statement submission as an industrial process , as requested by the planning officer in the pre application advice letter of 21 February 2020?

We also note that in the Dust Management Plan (15th February 2021) that it states that *'the works are not likely to be different to the practices already being undertaken'*. As we have stated above, the work practices at the factory have recently changed and therefore because the consultants have not been correctly briefed, has resulted in their report being invalidated as it ignores the dust/vapours that are created by this change to the applicants casting processes.

At para 5.21, mention is made that *'a 7m landscaping buffer will separate and, in time screen the proposed residential development from the new employment unit to the north'* The clear inference here is that any screening will not be mature and will not screen the new building for many years or even decades to come. However, no mention is made of any screening of the new 2 storey buildings (the current factory is single storey) from being viewed from the west or north west in West Lund Lane. The visual amenity of the area, viewed from West Lund Lane, will be adversely affected due to the topography of the site and the height, length and sheer mass of the proposed extensions located at a high point of the site. This is made worse as it is proposed to remove the existing mature hedge/tree line that currently runs north-south parallel to the existing microwave building, which currently is completely screened by it. These extensions (phases 1 and 2) as planned will, as a consequence of their design, be visually intrusive and clearly not in line with policy SP20 in terms of either design or character. The detail on the phase 3 building(s) is so vague as to make it impossible to comment, other than if they are to be two storey they are also very likely to be visually very intrusive abutting what is a quiet rural lane in the countryside, and contamination (of all sorts) from them on neighbouring residential properties will be worse than the current, far more distant, factory use.

At Para. 5.24 it states that for the phase 3 element of the application *'Sylatech envisage...it will be occupied by a subsidiary company or companies...'* We refer again to the fact that this site is designated in the local plan - Policy SD13 "for existing employment only" ie for Sylatech's sole use (the existing employer) and not for general commercial purposes by other businesses who may or may not have any connection with Sylatech.

**National Planning Policy Framework**

The NPPF states that developments should be sustainable and it makes clear that to be a sustainable development it must "meet the needs of the present without compromising the ability of future generations to meet their own need". Many of the objectives in the NPPF are clearly not being met by this application on a number of counts:-

- **Economic** - there is nothing in the application that evidences that the commercial element will enhance job prospects for local residents. There is every likelihood that any new jobs that might be created will merely see the people with the requisite experience and skills being brought in from other parts of the country. If such people wish to live in the area it will place even a greater burden on hard pressed local services eg GP's, Dentists etc. The application provides no positive contribution to allow current services, that are already at full capacity, to expand to meet the new demand that will be placed upon them.
- **Build a strong, responsive and competitive economy** - The needs of future generations will be compromised by this application if the basic needs to enhance health and educational standards are not supported by any new commercial or residential proposals. Without these basic criteria being delivered, future generations of employees will lack the basic educational standards, particularly in STEM subjects. The applicant's future workforce will also not have access to necessary local medical facilities to help them have illness and injury quickly and expertly addressed to enable a quick return to work.
- **Environmental - contribute to protecting and enhancing our natural ...environment.** Food security is becoming an ever more important issue in the UK and elsewhere in the world. The applicant is seeking to permanently take out of productive agricultural use nearly 12 acres of grade 3 (Good Quality) land. The applicant states (para 8.51) that the land is '*...not in use at the present time...*' This is incorrect. The land is used as grassland for grazing and most recently harvested for haylage/silage as a food crop for farmed animals. This year's crop was approximately 200 large circular bales of hay. This country needs to make its food security more robust in this ever more dangerous world. The recent invasion of Ukraine demonstrated very clearly the impact the invasion had on food security and prices around the world including the UK. Once good quality agricultural land is concreted over it will never again be able to be farmed by future generations. This is not sustainable.

At para 8.78 of the Archaeological report it says the site has been in agricultural use since medieval times. This suggests the land has been in agricultural use since at least the 1400's. The population of England then was around 2 million. Today it is over 56 million. By any calculation this is a massive population increase and this agricultural

site, as part of the bigger picture, is an invaluable farming site that contributes towards Englands food production and food security and which should be protected from unnecessary and ill conceived development.

The West Lund Lane/Gawtersyke Lane area is a very a quiet, pictureque, rural environment. The development will add nothing of benefit to it. As just one example, the light pollution from the street lighting on the proposed residential development will be intrusive to an otherwise dark area. There is also no assessment or detail provided by the applicant of the additional environmental pollution impact of new street lighting both along West Lund Lane and on the commercial development site proposed, but it will have an adverse impact upon the bird, animal and human population. It will also adversely impact on the dark sky views locally due to the level of radiance from the development shining into the night sky. This is a matter of great concern as Kirkbymoorside abuts the North Yorkshire National Park which is a recognised Dark Sky area. CPRE, the countryside charity, has carried out surveys across the UK of light pollution. On its "Light Pollution Dark Skies Map" it identifies the level of current radiance shining into the night sky. For West Lund Lane, south of the railway bridge, they measure the current light pollution as between 1-2 Nanowatts/cm<sup>2</sup>/sr ie its the 4th darkest category out of the nine categories. Any artificial lighting placed in this area will add light pollution to an area that has none currently.

There is no doubt that the adverse impacts of this application significantly and demonstrably outweigh the benefits when considered against the NPPF and the councils development plan. The NPPF makes it clear that a council, in deciding whether to depart from a Development Plan, may do so only if material considerations of a particular application show the plan should not be followed. We consider that the matters contained in the application are lacking in substance and weight and are not a convincing reason to depart from the local plan policies. This proposed development will not in any way benefit the economic, social or environmental conditions in Kirkbymoorside.

The NPPF on promoting sustainable transport highlights that safe and suitable site access needs to be achieved for all users. The applicants transport modelling has demonstrated that Sylatech's existing site access directly onto the A170 is safe and suitable for all its deliveries, staff etc and the junction can operate well within its design capacity. The residual very small numbers of visitors and potentially a further handful of jobs in phase three demonstrates that they too can be designed very cost effectively to access the A170 via the existing entrance and there is no significant or demonstrable benefit to the applicant or the wider community to create an unnecessary new access onto West Lund Lane.



No mention has been made about the speed of vehicles travelling along the A170 passing West Lund and West Lund Lane. From casually observing the automated speed sign on A170 to the east of the West Lund Lane junction, it is apparent that the vast majority of vehicles are exceeding the 30mph speed limit at this junction. The Transport Assessment and Travel plan makes no proposals to address this specifically to provide safe access and egress to/from West Lund Lane for existing residents and the new users from the proposed development. Significantly more vehicles will be using this junction if the plans were to be approved.

Policy SP 14 on Biodiversity sets out clearly that the districts biodiversity should be "conserved, restored and enhanced". The proposals show a reduction in the variety and quantum of current natural features visible on the site. The landscaping replaces mature trees and hedgerows with young immature trees, whips and small areas of open space grass, much of which will be "manicured". The buffer/ bunding strip will only have screening that will "in time" screen visually intrusive features of the development and the proposed "enhancements" seem to focus on not carting away felled mature trees but laying them on the ground to gradually rot away. These proposals are all far inferior to what is now in existence in the natural/rural environment of the site and to suggest that the proposals are enhancing the biodiversity of the site is disingenuous at best.

At para 8.153 in the planning statement, the applicant states that '*the proposed development will also introduce significant area of open space and environmental improvements..to offset any loss*' This statement stretches the reality of the situation beyond belief. The open space being provided is not substantial or readily useable by local residents. It has been broken down into such small areas and/or narrow strips to such an extent as to be negligible and which has no local amenity or environmental value.

The applicant submits that there is justification for development in the countryside. The application states that the southern boundary of the employment zone is not a robust boundary. By simply reviewing the plan (at figure 2.2 Ellis Healey Architects) it is blatantly obvious that the southern boundary has been assessed and carefully selected by the council to align with the adjoining southern commercial and residential boundary immediately to the east. This is a clear and robust boundary which can and should be respected and adhered to.

We note the comments by the NYC Ecologist and due to a number of his concerns having not been properly addressed by the applicant, we reserve our right to make further comment when the ecologist has received a full response on all matters. We note that RDF Ecology response of 16.09.21, that there is no detail on who, how, when, where and at what cost the wild flower meadow creation will occur nor does it make clear how the longer term management and maintenance of it will occur. Without good

maintenance and management there will not be a flourishing 'meadow' and grass will invade and take over. RDF's response admits that the '**areas will be smaller... would be of higher value**' but there is nothing in the response as to whether the applicant will meet the costs of managing the areas longer term to achieve true sustainability. Finally on this issue, we bring to your attention that the file dated 27.06.2024 - DC Biodiversity net gain metric is probably corrupted as we cannot open it in full and therefore cannot fully read or comment upon it. **Please advise us when this problem has been resolved on the planning web page.**

At paras 8.101 - 8.103 in the planning statement, the focus of the mitigation of the accepted '*key noise source*' is focussed on the proposed new residential plots and little, if any, consideration has been given to mitigate, reduce or avoid noise impacting upon the existing neighbouring properties in West Lund Lane, Parkers Mount and roads off it and in Ings lane. What is even more worrying is that the Noise Impact Assessment has '*determined that with mitigation measures in place, the noise level will be noticeable...!*'. This is a wholly unacceptable outcome for all existing nearby residents and clearly does not meet the requirements of the NPPF and the Local Plan policy SP20.

### **Transport Assessment**

At Para. 2.2.8 in the planning statement, it makes clear that all access and egress to the existing and new factory extensions, including staff and deliveries will be via the existing entrance off A170. it states that '*the new proposed West Lund Lane commercial access.*' will only be used by visitors. This clearly supports the view that a new entrance onto West Lund Lane **is not required** for 12 visitor parking bays.

We also note that the Transport Assessment confirms that '*West Lund Lane is insufficient in width to serve the proposed development...*' It also states '*carriageway widening and and new pedestrian infrastrucure will be necessary...*'. It then states '*that there are no road safety issues ...and should not affect the safety of pedestrians and cyclists*'. These statements have not been properly considered against the physical constraints and current uses of the lane and therefore the proposed development is not in accord with the local plan policies or the NPPF for the following reasons:-

- West Lund Lane is single carriageway and the width of the current carriageway, at its narrowest point (the bridge), is 2.95m. At this point the total width available for widening is approx 7.5m. The submitted design shows that there will be no verge or footpath on the west side of the carriageway and a 1.5m footpath on the eastern side. It however does not correctly identify that at the northern end, the footpath will be substantially reduced down to only 1m due to existing physical infrastructure constraints. 1m is an insufficient width for pedestrians to safely pass without stepping into the carriageway. We note that in their response to the

Highways Engineer dated 6.7.21 (submitted to the portal on 2.9.21), at the top of page 3, they state '...(whilst also retaining a circa 0.5-0.6 m wide buffer between the edge of the carriageway and the western parapet)'. Their plans show that this 'buffer' is actually taken up with safety fencing and kerbing and provides no buffer at all.

- The proposed widening of the carriageway from the development is to 'provide a width of at least 5.5m between the proposed site accesses and the existing wider carriageway on West Lund Lane to the north (between Parkers Mount and A170 junction'. At the bridge "pinch point", taking into account the proposed kerbing and safety fencing works to the western side of the carriageway abutting the bridge wall, there is insufficient overall width to provide both a 5.5m carriageway **and** a 1.5m footpath (also see comments above on footpath).
- West Lund Lane currently has virtually no traffic on it other than regular agricultural vehicle movements to enable the farmers to access and egress Broats Farm and three other barns and fields with livestock in them. Basic agricultural vehicles (tractors and JCB's), without any agricultural attachments vary in width between 2.4m and around 2.50m. The width of the same vehicle increases when it has fully mounted equipment or interchanged towed equipment to up to 3.0m. We have attached a few photographs showing a small selection of some of the types of vehicles and equipment that use the lane currently to demonstrate this point.

Standard HGV vehicles that will need to access the proposed housing development are all in excess of 2.5m wide eg a refuse vehicles average 2.6m and skip lorries up to 2.97m.

According to "Which Magazine" There are now 160 car models in the UK that cannot fit into a standard 4.8m x 2.4m car park space, of which 27 are also too wide.

It is therefore not unreasonable to assume that on a daily basis, agricultural vehicles with attachments and/or trailers will meet an HGV or a wide car (some SUV's can be up to 2.209m wide) on the proposed 5.5m wide carriageway. Their combined widths (Agricultural/HGV) being **up to 5.97m** (5.209m for an Agricultural/ SUV)

# The applicants response to NYC Highways Engineer submitted on 2.9.21 - Query 4, sets out what they believe the road width requirements are. It does not take into account the larger vehicles that do use West Lund Lane as set out above. The design must allow such vehicles to pass freely without having to leave the

carriageway. A widened road must be safe to use at all times and not merely safe some of the time. The proposed widening is clearly not sufficient or safe.

Taking all the above facts into account, there are significant and unacceptable road safety issues that will affect pedestrians, cyclists and vehicles, as passing vehicles will have to regularly mount the pavement, putting pedestrians at significant danger, so as to be able pass each other or, risk hitting each other if they don't. There is therefore clear justification, based upon planning policies to refuse the application on highway grounds.

The Transport assessment also states that there is likely to be 176 two way trips per day from the proposed residential development of 67 units. It does make it clear (Para. 5.1.4) that there was only a very small number of sites on the TRICS database that could be used for trip generation modelling. We have as a consequence considered the actual number of vehicles per household in Parkers Mount (and roads off it) as a far better and more reliable case study based on actual local socio economic conditions which are more likely to be replicated at any proposed new residential development. At our last count (7/9/24) over 70 vehicles were present at the 40 properties, most of which are two or three bedroom properties. Also from observation, virtually all of those vehicles make more than 2 two way trips per day. If this is applied to the proposed 67 units, of which a number are identified as 4 bed units, the number of vehicles, and therefore trips per day, will be significantly higher than the 176 shown in the transport assessment. This will increase the risks to all users of West Lund Lane both new and existing as traffic flows will be far higher than in the Transport Assessment.

We note that the Transport Assessment (Para 5.4) is using data from the 2011 Census rather than the up to date 2021 census. Using data that is over 13 years old does significantly reduce the reliability that can be placed on it due to the known growth in the population and vehicle ownership over the same period.

Para 6.4.9 of the Transport Assessment sets out the assumption for access and egress for visitors and phase 3 staff based on the proposed new West Lund Lane access. Due to the very small numbers of potential vehicles involved and the fact that elsewhere in the assessment (and commented upon by the NYC Highway Engineer) it is evidenced that there is plenty of capacity on the existing Sylatech entrance junction with A170, one has to question why the consultant has made this unnecessary assumption rather than assuming the use of the existing access to the A170 and then making recommendations to do so.

At para 8.154, the Planning Statement makes great play about the close '300m' proximity of the site to a bus stop and how this will allow access to services to other settlements such as Pickering, York etc. and thus enable less use of private cars by the

residents of the proposed new housing. This measurement is of course wrong; The applicants Travel Plan at para 3.3.1 contradicts this assertion. It makes clear that the walking distances from various parts of the site vary between 450m and 900m. There is no measurement provided from the centre of the site, only at its boundaries. Such a measurement will of course be higher than those quoted. It also states that '*within "guidelines for public transport in development" (IHT, 1999)... the generally acceptable maximum walking distance that a bus stop should be from a development site is 400m'*. This is not achieved on this development.

The Travel Plan at para 3.4.2 sets out the current routes and frequencies of local bus services. Two routes are daily frequency and one is hourly. The proposed development adds nothing to these very limited services and it is incredulous to think that such existing limited services will stop residents from using their private cars. The proposed development offers nothing to actually improve or increase the range of routes or their frequencies. For this reason, the applicants suggestion in the Planning Statement that this shows the proposed development is sustainable and provides environmental benefits is fundamentally flawed and can and should be given absolutely no weight at all.

### **Council Tax**

At paras 8.141 - 144 the applicant makes mention of the extra council tax (CT) that might be generated for NYC if the plans were to be approved. This is not relevant or actually a correct assertion in respect of local government funding. The applicant makes no mention that extra residential properties mean that more local services have to be provided by the council and that these extra services will be at a cost to the council eg refuse and recycling collection, education including SEND support,, public transport etc. Furthermore, unless there is a change in the way Revenue Support Grant (RSG) is calculated by central government, it is highly likely that extra CT will see a commensurate reduction in the amount of RSG the council receives. Lastly, it has been well publicised that NYC needs to make around £30 million savings from its budget and this development will clearly add to that challenge and not assist the council.

### **Social**

At 8.147 in the planning statement, it is stated that the development will '*...also provide homes for the skilled workforce required by Sylatech'* This is a statement without any evidence to support it and should be ignored. There is nothing in the residential proposals that unequivocally link the employees at Sylatech taking up housing at this site. There are no proposals or guarantees provided by the applicant to make this happen. What this statement clearly infers is, that it is the expectation of the applicant

that the extra jobs that might be created are most likely to be filled by individuals from outside of Ryedale or indeed North Yorkshire.

It is clear from the numerous issues we, council officers, and many others, have raised about this application, that it is **not** in accordance with the relevant policies of the Development Plan and should not be allowed, as set out in S.38(6) of the Planning and Compulsory Purchase Act 2004. We therefore reiterate that we strongly object to the application, as submitted, and urge the council to **refuse this application in its entirety.**

Yours sincerely,



To:

North Yorkshire Council (Ryedale area)

Ryedale House

Old Malton Road

Malton, YO17 7HH

**Photographs of West Lund Lane with various Agricultural vehicles using it.**









