

Jayne Darley

From: Chris Watson
Sent: 01 December 2014 13:18
To: LDF
Subject: FW: Selby District Council Local Development Framework - PLAN Selby - The Sites and Policies Local Plan and Flood Risk SPD Consultation
Attachments: DOCO Response.pdf; Traffic Management Response.pdf

Chris Watson

Business Administration Assistant

From: Shanks, Jim [<mailto:Jim.Shanks@northyorkshire.pnn.police.uk>]

Sent: 01 December 2014 13:14**To:** Chris Watson**Cc:** France, Matthew; Burrell, Steve**Subject:** RE: Selby District Council Local Development Framework - PLAN Selby - The Sites and Policies Local Plan and Flood Risk SPD Consultation

Chris,

With reference to the PLAN Selby consultation, please find attached two responses, one from our Police Traffic Management Officer and the other from myself.

North Yorkshire Police will be making a separate response to the Infrastructure Delivery Plan, as this aspect is dealt with by a different department within the organisation.

Many thanks

Jim

Mr Jim Shanks
 Staff No 6107
 Designing Out Crime Officer
 North Yorkshire Police
 Police Office
 Fulford Road
 York
 YO10 4BY

Direct Dial: 01904 669883

Mobile: 07971794860

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Our Ref:
Your Ref: PLAN Selby 2014



Monday, 1st December 2014

Mr C Watson,
Policy & Strategy Team,
Civic Centre,
Doncaster Road,
Selby,
YO8 9FT

Dear Mr Watson,

Re: PLAN Selby – Delivering the Vision

Thank you for the correspondence with regards to the Selby Plan. I have examined the document and offer the following observations on behalf of the North Yorkshire Police (NYP) on traffic management issues;

I have read through the Plan and associated documents. Although it is accepted that Selby District Council are not the traffic authority and therefore have no statutory duty under the Traffic Management Act 2004, there appears to be no mention of road safety engineering and casualty reduction in the Plan and how this fits into and complements other local plans of bordering authorities (ie the City of York Local Plan), or more importantly the North Yorkshire County Council Plan, who are the traffic authority for Selby.

It is accepted that the Sustainability Assessment objectives previously undertaken in respect of the core strategy are to remain the same in respect of PLAN Selby. However, it should be pointed out that issues such as road casualty reduction, speed restrictions and traffic calming have not been identified as a specific key objective, nor have national guidance documents as issued by the Department for Transport and Association of Chief Police officers (ACPO).

The question of reducing 'road accidents' (not casualty reduction) has been incorporated as an add on to question 5.4 of the Sustainability Appraisal key objectives, which appears to be aimed primarily at Health & Safety issues. Question 33 of the key document, *PLAN Selby – Delivering the Vision*, asks about design standards for building, but again does not mention any of the above.

The plan identifies employment land of between 37 to 52 hectares. The plan does not discuss numbers of jobs created. This makes planning exceedingly difficult with no projected numbers. If the projected housing needs are realised of an average of 450 homes a year and 7,200 new homes by 2027. This exponential increase in traffic, despite vague mention of sustainable transport plans, is likely to have a severe impact on the road network and it is important that an

increase in casualties, emerging road safety issues and an increased call on resources, both in the short, medium and long term is prevented.

It is a fact that many injury accident sites can be engineered out before they become an issue by appropriate road safety engineering in conjunction with a system of Road Safety Auditing, based (currently) on the 'Design Manual for Roads and Bridges' Volume 5, Section 2, part 2, 'Road Safety Audit', HD 19/03. The process of road safety auditing is proven as effective and allows a clear demonstration of a duty of care to be shown by the traffic authority. The completed road safety audit process becomes a legal document.

Road safety and casualty reduction are important facets of a safe road network. Road safety and casualty reduction are linked, but are separate entities. Road safety deals with issues which are perceptual as well as actual, whereas casualty reduction deals with tangible issues only.

A robust road safety and casualty reduction strategy is essential and key to managing resources effectively for all three emergency services and for the NHS. There is no such strategy mentioned in the plan, despite road safety and casualty reduction being a priority for NYCC, elected members and all three emergency services.

There is no legal requirement in the UK, at the moment, to complete road safety audits, but EU legislation has now enshrined (from October 2013) this process for the pan-European highway network (ie. strategic motorway network). This has been fully embraced by the Highways Agency (on behalf of the Department for Transport) over a number of years and is seen as best practice.

At the moment there is no requirement for a property developer to submit, at the outline planning stage or at full or reserved matters application to Selby DC or NYCC, a Road Safety Audit (Stage 1 or 2) to be carried out to the local traffic authorities satisfaction. Nor has there been a requirement to follow this process through to all other stages of the process (Stage 1,2,3 4a & 4b). It is considered that this is a serious weakness in the plan as it means that SDC and NYCC have little or no control of any road design from NYCC qualified road safety engineers, up to the point where a new build interfaces with the publicly owned road network.

Private road networks, which are likely to remain so, can be particularly problematic, with no structured and specific LA led auditing process taking place. This is for example, reflected in supermarket car parks, some of which have been described by engineers as "horrendously" designed. The implications are that injury accidents and conflict regularly occur which involves the attendance of emergency services to deal and therefore a needless commitment of resources, as many of the issues could have been designed out before build.

Under the Traffic Management Act 2004, it is the local traffic authority, in this case NYCC, who have full responsibility for running their road network effectively and safely, yet NYCC appear to have very little control of how that affects their network from new builds, which the LA are then expected to adopt onto their network.

Although it is not a legal requirement of the NYP to take part in Road Safety Auditing exercises, it has been the case for a number of years, that NYP have provided suitably qualified staff, at their discretion, to these audits at various times, providing different levels of expertise and advice. This is seen by NYP as an important low cost process in casualty reduction, positively influencing road design and road user safety, whilst reducing the likelihood of issues arising

which may require the need for deployment of expensive and finite resources to deal with and control the aftermath.

By missing the opportunity to be able to influence road design and safety issues, there is a price to pay for all three emergency services, including the NHS and the wider community, in both public health terms and exponential increase in resources required. This situation can be controlled, reduced or not allowed to develop to start with, by good road safety design, management and a robust auditing process.

It is therefore advised that a robust strategy of road safety and road safety auditing on roads and infrastructure both privately and publicly maintained, aimed at casualty reduction, should be included in the plan and be a requirement of any developer to satisfy the requirements as set down by the LA at an early stage in the application and before a formal application is made.

Although many traffic offences are and will be enforceable under civil proceedings and by the use of ANPR and other technologies, not all offences are suitable for this type of action and the police are the main enforcement agency for moving traffic offences. There is an expectation on the police to enforce certain offences. Due to the demand on current resources, the police have to be selective in prioritising enforcement effort. There is a likelihood that further and increased calls on policing resources will be made to cope with additional legislative requirements, made by NYCC on the road network. The possible increase in resourcing should be reflected in the Plan. The increase in police resource requirements is mentioned briefly at paragraph 2.58 of the Infrastructure Delivery Plan, but does not offer a funding methodology.

It is important to design road infrastructure in such a way that resource demand does not become unsustainable and follows closely relevant national guidance documents issued, in particular, by the Department for Transport and ACPO.

By following national guidance documents, as stated, which are based on sound research and best practice, there is a greater likelihood that the key objective of ensuring "...residents have a high quality of life..." will be met.

As an observation, paragraph 2.58 of the Infrastructure Delivery Plan refers to 'North Yorkshire Constabulary'. This should read 'North Yorkshire Police'.

Associated with road infrastructure and in order to continue to achieve a sustained improvement in overall crime rates, full cognisance should be taken of the Crime and Disorder Act 1998 and in particular, Section 17, which provides a clear obligation to the local authority to work towards reducing crime. Yet this obligation has been ignored in the past for some road design initiatives at the price of expediency and against the advice of police and with little or no effectively acceptable control measures. This leaves a lasting and long term issue for the police and community, which is largely, needless. I refer to and relate to, in particular, all under passes in the NYCC area, which suffer from ongoing and low level crime (ie. graffiti). Dealing with this is a difficulty for a road safety audit team as their remit (under HD 19/03) is restricted to dealing with pure road safety concerns. The plan should reflect a robust acceptance of the need to take crime reduction and prevention seriously and act on design and audit recommendations wherever reasonably possible.

Thank you for consulting me. If I can be of further assistance, please do not hesitate to contact me.

Yours sincerely

Mr Steve Burrell Dip ASM MCIHT MSoRSA
Traffic Management Officer

