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Your ref 07/2021/00886-887/ORM  
Our ref 07/2021/00886-887/ORM/NJS2  
Date 20<sup>th</sup> October 2021

(FAO Janice Crook)

Dear Sir/Madam,

**Application A: 07/2021/00886/ORM**  
**Application B: 07/2021/00887/ORM**

**Location: PICKERING'S FARM SITE, PENWORTHAM (LAND EAST OF PENWORTHAM WAY AND WEST OF LEYLAND ROAD)**

**Proposal A: OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED EXCEPT FOR THE PRINCIPAL MEANS OF ACCESS FOR A RESIDENTIAL-LED MIXED-USE DEVELOPMENT OF UP TO 920 DWELLINGS (USE CLASSES C3 AND C2), A LOCAL CENTRE INCLUDING RETAIL, EMPLOYMENT AND COMMUNITY USES (USE CLASSES E AND SUI GENERIS), A TWO FORM ENTRY PRIMARY SCHOOL (USE CLASS F), GREEN INFRASTRUCTURE, AND ASSOCIATED INFRASTRUCTURE FOLLOWING THE DEMOLITION OF CERTAIN EXISTING BUILDINGS**

**Proposal B: OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED EXCEPT FOR THE PRINCIPAL MEANS OF ACCESS FOR A RESIDENTIAL DEVELOPMENT OF UP TO 180 DWELLINGS (USE CLASSES C3 AND C2), GREEN INFRASTRUCTURE AND ASSOCIATED INFRASTRUCTURE**

I refer to the above applications and would like to thank you for the opportunity to provide comment on the proposals. I have viewed the submitted Transport Assessment and associated scheme correspondence, however based on the submitted documents, there are several matters unable to conclude due to lack of acceptable information. In addition, there are other matters which as presented are not supported.

LCC Highways' initial review and supporting correspondence dated 28<sup>th</sup> September highlighted a number of concerns with the approach presented being. These comments are intended to complement those provided by Highways England (National Highways).

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**Phil Durnell**

Director, Highways and Transport,  
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- Masterplan – LCC Highways consider the masterplan Principles and Mobility Strategy as presented does not demonstrate the delivery of the infrastructure necessary to support the scale of development proposed.
- Transport Assessment – Unfortunately with **this** application unlike the previous, no detailed pre-application discussions have taken place in advance of submission, as such I dispute the wording used in para 1.17-19 for this proposal. The approach used in the TA is not agreed at this stage, as that presented is not an assessment of impact that can be scrutinised by all.

'Vision and Validate' – the approach as presented is aspirational. While LCC Highways support proposals that will deliver significant modal shift, these must be realistic and deliver the necessary access to all modes of transport that will be required to support development proposals. Any vision presented must be evidence based.

### **Masterplan**

I don't consider the information held within the TA is considered a Masterplan as this should give clear detail that can be scrutinised by all on matters such as scale, form, location deliverability, satisfying policy, detail on highway (satisfying design criteria) within and their suitability including CBLR as well as connectivity, how existing properties will be connected into the development and how they access the wider network. The TA refers to active travel connections '*which will be retained and improved (where required and within the application sites)...'*. **The lack of masterplan and detail with the TA is a significant concern.** If a Masterplan has been produced akin in nature to the previous application, would be more than happy to provide detailed statutory comments on that presented.

### **Location**

The site is located to the south of Penwortham, South Ribble. It is bound by Penwortham Way\* (A582) to the west, existing residential development to the north (Kingsfold), the West Coast Mainline railway to the east (followed by residential area of Lostock Hall/Tardy Gate) and agricultural fields to the south (land which is also safeguarded land in the South Ribble Local Plan). The site comprises of a mix of land uses including agricultural land, a pylon corridor and a network of adopted roads and public right of ways (PROWs). There also a number of individual residential properties which are privately owned.

*Note\** LCC propose to dual the A582 road subject to gaining planning approval. It will support delivery of the local plan and strengthen this corridor, benefitting the existing/future built environment.

### **Proposal**

The TA produced by Vectos on behalf of Taylor Wimpey and Homes England outlines the proposals for planning applications including the demolition of existing buildings and a residential-led mixed use development comprising of:

- *Up to 1,100 dwellings (use class C3 and C2), including 30% affordable housing (separated by 2 planning applications as referenced above);*
- *A local centre including retail, employment and community uses, mobility hub and third place working environment space (Use Classes E and sui generis);*
- *A two-form entry primary school (use class F1);*
- *Green spaces; and*
- *Associated infrastructure.*

### Access (motorised only)

- Development Access 1: New Junction off Penwortham Way

The primary vehicular access is proposed at a new signalised junction off Penwortham Way providing access to an internal residential estate road to the majority of residential dwellings (i.e. 1,060 dwellings with no detail on estate road parameters), the school and the local centre. It is stated that two lanes are to be provided on the site access junction arm to separate right and left turning movements (this is supported). In addition, two ahead lanes are to be provided on the northern and southern arms of Penwortham Way, plus a dedicated left and right turning lane to facilitate access into the site whilst it will minimise the potential impacts on general north-south movements along the A582 corridor (this is supported).

- Development Access 2: Bee Lane

A new priority junction to be provided onto the exiting Bee Lane for 40 dwellings and to support other existing motorised movements. I am very concerned as Bee Lane remains as is and is proposed that this constrained pinch point is considered suitable for 2 way movement with the residual width available for a 'Pedestrian Clear Zone', I disagree with this suggestion.

Notwithstanding the additional vehicles (from the 40 units) and the increase in sustainable users (pedestrians, cyclists, parents/carers with prams, mobility impaired **this proposal of no change is not acceptable to the highway authority**. In addition, the existing roundabout does not include suitable sustainable provision to satisfy future demand nor does the junction support that required for additional vehicles when design standards are considered. **This is a concern to the highway authority**.

The TA indicates that Flag Lane will only provide motorised access to existing properties which will be encompassed within the new community

Note: No indicative layout is provided in the TA. However, in paragraph it states *'that no private vehicle connectivity between these accesses, without prejudice to through connectivity being provided in the future should the Authorities pursue the Cross Borough Link Road (CBLR) across the site'*.

The application does not provide a layout or strategy that provides all accesses i.e that which provides connectivity within or into the wider environment. The TA does refer to an existing network of lanes which provides local access to properties within the site and form part of an active travel network which includes PRow. **This lack of information or detail is a major concern as it is not possible to understand the impacts or acceptability on existing residents.**

### Public Transport

The TA indicates that the applicant has had early direct discussions with a commercial operator. An operator is willing to provide a new 30min service with point on access and egress being off the new access onto Penwortham Way. The new service will have a bus turnround somewhere within the site and operate a service between the site and Preston City Centre (including Preston Railway Station). The TA goes on and suggest *'flexibility for the route to be extended providing an internal loop around the wider masterplan area in due course'*.

I have concerns with what is being proposed:

- 30min service not being suitable to satisfy customers' needs (e.g. to places of employment to appointments etc, satisfy demand in all directions/destinations).
- No detail on the duration of the service (Mon-Friday, Evening Saturday or Sunday)
- Don't know about walk distances from all dwellings at stages of development (lack of masterplan)
- No detail on the internal provisions that ensures patrons are comfortable, secure, with of ease access
- No evidence is presented that this that it can be sustained indefinitely without burden to existing services or to the public purse (funding risk post pump priming).
- Incomplete approach to PT, and isolated.

In conclusion that proposed doesn't ensure PT is attractive alternative to the private car and no evidence is presented that PT usage will be greater than that locally available. It may be the case PT usage will be lower. **This is a significant concern.**

I do acknowledge that their the No3 service (Preston) that circulates Kingsfold has a frequency of circa every 10mins (as indicated in TA Table 2.3) and the No111 service that traverses Leyland Road has a frequency of circa 8mins. These frequencies for the journey to work within Census areas 006A-D which incorporates the site and Kingsfold is only between 4-8% and use of the private car is between 70-77%\*. Based on this simple evidence in isolation the provision offered is unlikely to have a big impact on this proposal.

New residents will be able to use this existing provision (No 3 and No 111) however consideration must also be given to its attractiveness when the site is circa 800m x 1200m in size. What consideration has been given to existing capacity on these services during peaks.

*Note: Suggestions have previously been proposed, as part of previous application would benefit this site.*

*\*Based on the modes used in Table 6.4 of the TA*

### **Parking**

The TA makes reference from a SR parking standard perspective that the site is located in an Area C (other areas) with greater level of parking for non-dwelling related uses. As no further detail has been presented it appears that maximums are being progressed which is not in accordance with their strategy. This promotes access and use to the private car for all land uses including residential dwellings.

If lower standards are to be adopted including for residential to be more in accordance with the strategy, i cannot see based on the limited information presented how parking could be controlled and not have impacts on the surrounding highway network.

Note: there could be a minor anomaly within the Table as non-food is in line with Area B.

The parking strategy appears to be in line with standards and does not limit against use of the private car.

### **Cycling and walking**

No details provided to make comment on or how this provision suitable and seamlessly integrates into the local and wider environment. The only detail provided relates to the eastern access junction and Bee Lane bridge, which is not supported. I must also highlight that there

is no sustainable proposed at the primary access or parallel to the A582. **The lack of detail and agreement is a concern.**

The TA includes a table of amenities, and distances. There is much greater level of amenity available in Tardy gate not included which will be attractive for this development site.

It is not clear how distances are determined. As the site is large i would expect a maximum distance and a minimum distance (walk and not crow fly) for each parcel of development (1060units & 40units) to each amenity. This is required to provide a more realistic assessment (and to be based on an indicative masterplan). A single distance to represent the whole development is misleading irrespective of how it is determined. **This is a concern.**

Whilst Census data has been used which has a level of sense indicating the existing situation (when collected), I question where the new employment will be locally that can be walked or cycled to, as per this approach<sup>3</sup>. Some parameters are not ideal for growing up.

There is no thought of existing provision that is necessary beyond the site to promote sustainable use whether on existing roads, PRow or within local existing built environments or hubs such as Tardy Gate, Lostock Hall or the Railway station.

The TA makes reference to a WYG report titled '*How Far Do People Walk and cycle*'. The report does make use of data, however as expected if averages are considered rather than 85%<sup>ile</sup> walk distances are much lower, the report also indicates at the 85%<sup>ile</sup> distances for men are generally 400m longer. It is important that data used is not misleading, the report also provides commentary on mobility impaired. I don't dispute the use of information from the report however **consideration to the average person is more appropriate**. The report can be used in parallel with the historic CIHT distances.

*Notes:*

- 1 *the WYG report was presented at the PTRC meeting.*
- 2 *Whilst I strongly suggest the use of averages, i believe there are errors within paragraph 2.9 of the TA and the distances highlighted.*
- 3 *Local attributes but must be expandable (with certainty) to cater for future demands (Census data is historic- is not always suitable for growing, further though/information is necessary)*

### **Summary (of the above) and Additional Comments**

Sustainable development is promoted and supported; this site is no different (as are those within the local plan which have been assessed against the ability to be made sustainable). This site it is well positioned on the periphery of the built environment and as with the pre app discussions with the previous application could be made acceptable, if the applicant worked closely with all relevant organisations achieving buy in.

However, I am not satisfied with the discounting as proposed against the private car\*. As a suggestion it would be more appropriate if these formed part of the travel plan targets. A developer can offer opportunities to support modal shift but cannot guarantee a change in travel habits.

As we all know modal usage is based on a number of factors including time of travel, time of year, weather conditions, mobility of user, provision provided, willingness to use it, its availability, its suitability for each trip, perception of safety on routes, distances walked/cycled, historic influences i.e. what currently happens in that area. The approach proposed whilst

complex doesn't provide certainty and the consequences will likely result in greater impact and issues on the surrounding network in this case the A582.

Most concentrated local provision is located in Tardy Gate with short direct access only possible for a limited few with the most having to travel by private car (on the assumption that they do not walk, cycle etc). This will result in additional use of Coote Lane, (over and above that reported on in the model, which is limiting) not including additional requirements within Tardy Gate, Lostock Hall say for parking or those who choose to be sustainable for secure convenient cycle storage etc. **As presented, this is a concern.**

This excludes a development proposal that is not fully permeable or accessible in all directions by all users into the built environment. The development and access strategy requires those who need to access the built environment whether to the North, East and South to use the A582. No consideration has been given to those who are a less confident driver. For those who are mobility impaired or have limitations on time etc and wish to make a short journey say to Kingsfold Library or Post office for example need to travel a much longer distance when compared to simple limited access strategy that can cater for them (as suggested in pre app for the previous application). **This is an access strategy concern, potentially isolating certain members of the development)**

### **Education impacts**

Whilst the proposal includes a 2form school within the site, at this stage I am informed based on current Education forecasting its provision may only be required at the latter stages of this development. With this it should not be included as an internal trip as there is limited certainty.

### **Analysis**

As highlighted above i have concerns with the approach and that it underestimates the level of generation from the private car. **These matters with a willing applicant could be overcome.**

For example (excluding my comment that i consider the trip rates are slightly lower than what would be expected.

*Note: \*Whilst i appreciate and support impact per mode, in support i am looking into your trip rates by private car. However, this will take time, before i can conclude this.*

With regard to your factoring not withstanding my concerns with car trip rates, if the original trip rates and were factored to represent the full development then compared to that produced produces the following:

	Use of Factored trip rates for 1100 units (Cars)		Use of unfactored trip rates for 1100units (cars)		Difference (cars)	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
8:00-9:00	107	392	146	405	40	13
16:00-17:00	246	126	282	168	36	90
17:00-18:00	292	126	367	166	75	51

*Note: The approach used doesn't fully consider other purposes such as servicing and deliveries.*

### **Base data**

The collection and use of 2021 data is not acceptable to LCC, traffic levels are much lower than the historic, Consultants who undertake TA's in Lancashire are aware of this position.

I would also expect queues length be used (but as above the data to be typical). As highlighted above a number of junctions do suffer from high levels of queuing. This needs to be replicated.

**Data used in this assessment is not accepted and is a significant concern.**

### **Modelling**

The use of a microsimulation in isolation and as presented is not acceptable to LCC it does not identify the true impacts as highlighted within the TA. Microsimulation models can be used to support a traditional approach of modelling individual junctions using traditional proprietary software. All base models need to be validated first to fully represent the junction/area (including queuing). **The modelling approach unacceptable and a significant concern.**

It is not clear what highway changes have been applied to the network of interest, when compared to the current layout.

### **Microsimulation**

I note the modelled network excludes at least one key route in Kingsfold and other continuous highway links have been broken, **this is a concern.**

**It is a concern that standard parameters have been adjusted,** I am not sure in totality how many parameters have been changed and to what effect this has had to model performance.

It is good to note that bus stops and bus timetables have been used. Whilst signposting has been used to highlight hazards, I don't know what influence has been had to for example Parked cars, pedestrian crossings, school crossings, blocked link as a consequence of right turners etc,

It is surprising **and a concern** that actual signal timings have not been used in the base model, whether at signalised junctions or signalised roundabout. Notwithstanding these concerns, it is not possible to support a microsimulation model that I have not seen operate or have the opportunity to discuss the approach to develop the model. The printouts as presented have limited use, in isolation. **This is a significant concern.**

Usually a microsimulation model requires a level of fine tuning to represent the base highway network. I cannot comment further on the model.

### **Distribution of development traffic**

No comment can be provided as I have concerns with the microsimulation model, however it is clear that 1060 units will exit onto the A582 and 40 exit onto Leyland Road.

### **Committed development**

The TA suggest that the following development has been included. However, it is not possible to check based on the information presented. Whilst these are the most relevant, other development has been excluded.

### Development included

Croston Rd Resi 07/2012/0627/ORM	174 (350)units
Croston Rd North Resi 07/2014/0184/ORM	400 units
Land at Penwortham Mills 07/2014/0190/ORM	385 units
Gas works 07/2015/0315/REM	248 (281) units
Cuerden Strategic Site 07/2017/0211/ORM	210 units 205,600 sqm emp
Test Track 07/2017/3361/ORM	950 units 28000sqm emp

### Traffic growth

No traffic growth has been included in the TA, with a reason being the % growth exceeds TEMPRO. No evidence is presented to support this assumption. However, the approach is not supported as it assumes there is no other growth beyond that highlighted above. Therefore excludes:

- Other development within South Ribble irrespective of size
- Other development in neighbouring authorities.

**The approach adopted is not realistic or supported and a concern**

### Modelling results

The modelling whilst flawed and results are not accepted to represent the network with development. It is noted that the modes have not been verified by LCC or HE.

I note in a scenario with **no dualling** of the A582 when the development is added to a network with committed development (in 2031) in the PM on Route 2, EB (Tank roundabout towards the motorway- A582), traffic flows and average journey time reduces. This corridor is currently congested.

I am also surprised in the opposite direction (WB) according to the model that the journey time on this route which is 1158seconds (19.3mins) to travel 4km without development then suggests 1310 seconds (22.8mins) with development. This is not a concern of the applicant.

A further example of surprising results.

Route 4 (Penwortham Bridge to Stanifield roundabout (B5254)), PM peak, SB without development 771 seconds (12.85mins), but with development having only 40 units served off Bee Lane the journey time increases to 917seconds (15.29mins). This is not a concern to the applicant.

Finally, Route 6 (Coote Ln-Brownedge Rd) PM peak, EB without development 656seconds (10.9mins) with development increases to 832seconds (13.9mins). Again this is not a concern to the applicant.

Unfortunately, there is limited information breaking the results down to highlighting more specifically where the delays are however the results are very limiting in use.

On the strategic network at a number of locations highlighted in Table 7.16 of the TA, I question the results as traffic levels reduce on the network when development is added, this occurs during the pm peak. For example:

- South of M6 J29 a reduction of 139 trip with development
- North of M6 J29 a reduction of 212 trips
- East of M6 J29 a reduction of 82 trips
- West of M6 J29 a reduction 111 trips

*Note: Results presented are without A582 dualling.*



### **Further comments and Thoughts**

We are all aware there are several pinch points on the existing network including A582 corridor where queuing extends for several hundred metres. No issues are highlighted on the existing network which is a surprise and a concern.

As a suggestion, to the applicant in overcoming issues that they might want to look at other TA that have been reviewed in the area and potentially use existing data. I know as part of Leyland Tetrack application, there is a pinch point on A582 that would be at theoretical capacity (prior to further development i.e. this proposal).

Other sources of data could be Cuerden application.

As highlighted and suggested there is traffic data (including queue data) available. LCC is not the custodian of application data but as documents were presented to the LPA could be available from South Ribble.

In addition, I am aware that discussions were had between LCC and The Lanes (Pickering Farm) previous transport consultant with regard to shared data (and the analysis to support the A582 dualling).

### **Conclusion**

Unfortunately, as the applicant did not take up pre application advice, there are a large number of concerns with all aspects of that being presented.

The strategy promoted offers no real new measures to negate against use of the private car, the general provision is as per a typical development, to support the sustainability of the site.

All aspects of the analysis and modelling requires significant level work before it can be considered suitable for consideration to represent the site and wider location.

The only conclusion that can be reached based on the documentation presented is one of non-support due to lack of supporting evidence to enable the local highway authority to come to a conclusion. The local highway authority has always been available to work with the applicant to progress this important local plan site. With this I would suggest that my offer and that of Highway England (National Highways) is taken up by the applicant.

I hope the above is of assistance.

Yours Faithfully,



Neil Stevens  
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Community Services, Lancashire County Council