

LCC/SRBC3

Appendix 3C

Statutory Comments (Addressing Masterplan and
CBLR)

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your ref 'The Lanes' Masterplan August 2020
our ref Masterplan\Consultation\NJS2
Date 3rd September 2020

(For the attention of Mrs Janice Crook)

**REQUEST FOR OBSERVATIONS ON THE MASTERPLAN FOR 'THE LANES'
PICKERING'S FARM RESIDENTIAL DEVELOPMENT SITE, PENWORTHAM**

**Address: PICKERINGS FARM SITE, PENWORTHAM (LAND EAST OF
PENWORTHAM WAY AND WEST OF LEYLAND ROAD)**

Thank you for your letter requesting our further views on the Masterplan for 'The Lanes' Pickering's Farm, development site.

The request for views comes following the production of an amended Masterplan document. The document has been produced on behalf of Taylor Wimpey and Homes England by their Planning Consultants (Avison Young). The latest Masterplan to which these comments relate is dated August 2020 and comprises the following documentation:

1. Masterplan
2. Design Code
3. Infrastructure Delivery Schedule

Summary

LCC Highways have reviewed the submitted Masterplan plans and associated documentation. Our view is that further information is necessary to demonstrate the Masterplan can be considered sound by the highway authority, such that it can and will deliver necessary and appropriate infrastructure and sustainable links with connectivity to the wider network at the time required to support comprehensive development of this major site for development, while satisfying relevant policy.

Therefore, I would recommend the application is considered but the decision deferred in order that the applicant may engage with the planning authority, taking on board planning committee recommendations, and also the views of LCC Highways with the aim to address the matters highlighted in these comments.

If a planning decision is to be made at this stage our recommendation must be one of refusal with the reason being lack of necessary information and not satisfying relevant policy.

Phil Durnell

Director, Highways and Transport, Lancashire County Council
Cuerden Mill • Cuerden Way • Bamber Bridge • Preston • PR5 6BS

Background

LCC Highways were approached in 2018 by Eddison/Croft Transport Planning with a request for pre-application advice in regard to the Transport Assessment (TA) being prepared to support a planning application on this site. A detailed pre-application advice note was subsequently passed to Eddison/Croft on 20th August 2018.

LCC Highways also received a request from South Ribble Council for scoping opinion observations in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for a residential-led mixed use development and Cross Borough Link Road (CBLR) on land to east of Penwortham Way. LCC Highways comments were passed to South Ribble BC on 23rd November 2018.

LCC were then requested to provide comments on the Draft Masterplan for 'The Lanes' development site, which we provided dated 16th January 2019.

In addition, LCC's Highway Development Support Team Manager has been involved throughout in providing advice and guidance to the Steering Group who were tasked with developing the Pickering's Farm Masterplan.

Then in January 2020 LCC Highways were consulted on the submission of the following:

- Masterplan submission for 99 hectare site comprising of land allocated under Policies C1 (Pickering's Farm, Penwortham) and S2 (Safeguarded Land) of the South Ribble Local Plan
- Cross Borough Link Road (CBLR) Planning Application (07/2020/00014/FUL – Proposed construction of Link Road between the A582 Penwortham Way and the B5254 Leyland Road)
- Outline Application for up to 1100 dwellings (C2 residential care and C3 residential dwellings Use Classes), a local centre including retail, employment and community uses (A1, A2, A3, A4, B1 and D1 Use Classes), a primary school (D1 Use Class), a community/skills centre building (D1/D2 Use Classes)

There have been a number of meetings, and discussions continue, in regard to the current planning applications. These, to date, have resulted in changes to the submitted plans and documentation.

The latest consultation in this process with regard to this Local Plan major development site is now this amended Masterplan (August 2020).

Clearly there are common themes that LCC Highways have provided in response to each of these various requests. In each case we have aimed to provide consistent comments with particular focus on the specific request. Throughout, LCC Highways have consistently placed emphasis on the need to conclude development of the Masterplan to a point where general agreement can be reached as a priority. This will allow a clear understanding of how the submitted applications align with the Masterplan and then in turn allow identification of when necessary infrastructure and mitigation will need to be delivered (trigger points).

The Lanes, Pickering's Farm Site Masterplan

The Masterplan seeks to deliver a residential led mixed-use community which could deliver up to 2000 new homes. If approved by South Ribble Borough Council (SRBC) the Masterplan would then be used to guide and co-ordinate future development within the site.

The principles set out within the Masterplan proposals seek to demonstrate how this large residential-led development can be brought forward in a sustainable manner. The Masterplan also seeks to demonstrate how the requirements of the local plan can be met with regard to the Cross Borough Link Road (CBLR) and provision of this east/west route to provide local access to support development, subject to detailed design and funding/delivery of infrastructure outside the control of the developer.

The draft Masterplan makes direct reference to the South Ribble Borough Council (SRBC) Local Plan and in particular Policy C1 – Pickering's Farm and Policy A2 in relation to delivery of the Cross Borough Link Road (CBLR).

Given the scale and strategic importance of the site, the SRBC Local Plan sets out how comprehensive development of the site is crucial to ensure delivery of essential infrastructure and local services.

Policy C1 sets out that planning permission will only be granted for the site subject to the submission of:

- a) An agreed Masterplan for the comprehensive development of the site;
- b) A phasing and infrastructure delivery schedule; and
- c) An agreed programme of implementation in accordance with the Masterplan and agreed design code.

Cross Borough Link Road

The Masterplan makes reference to The Cross Borough Link Road, as highlighted in Policy A2 of the South Ribble Local Plan. This states that land will be protected from physical development for the delivery of the Cross Borough Link Road (CBLR).

LCC Highways Previous Comments on the draft Masterplan

(Comments provided 16th January 2019)

I consider the following summary reflects LCC Highways position as set out in our earlier comments and during discussions with Taylor Wimpey/Homes England (TW/HE) and their representatives. This being that considering the final layout of the Development Site, the Masterplan is not unreasonable in a number of aspects. However, this Masterplan only works if the plan can be delivered, with consideration for sufficient detail in regard to infrastructure design/deliverability, planning requirements/deliverability and funding mechanism/viability.

Following review of the draft Masterplan documents submitted at that time there were some matters which LCC Highways deemed, in general, acceptable and a number of matters that required further consideration

Matters deemed, in general, acceptable to LCC Highways (as 16th January 2019);

- The comprehensive layout of the main access and associated internal access roads (subject to detail design to appropriate standards; s278/s38);
- Indicative primary and further secondary access points (subject to agreement on delivery of the full strategic Masterplan and CBLR);
- Longer term proposals to deliver infrastructure to support public transport routing into and through the site;
- Limited use of quiet lanes for sustainable modes and to satisfy existing residents/businesses (only where appropriate and subject to evidence; LCC Highways

have been very clear, the presented approach of the widespread use of the existing lanes in lieu of high quality sustainable infrastructure provision prior to the delivery of the full CBLR is not supported);

- Location of proposals for the school, local centre and other commercial land use elements (note: school location amended in latest Masterplan proposals – moved further to the north and is now shown accessed off a secondary road with provision for a drop off parking facility, the community building has been removed);
- The principle to deliver a detailed Phasing and Infrastructure Delivery Plan for vehicular traffic, including CBLR - subject to evidence that satisfies needs of all users and the wider integration at all stages/plans (evidence still outstanding, including Masterplan viability, Full CBLR design (new bridge and junction with Bee Lane), scheme cost estimates and planning requirements, including agreed responsibility for delivery);
- Development proposals to be supported by a detailed Transport Assessment (TA) and site Travel Plan (TP), (Note: while the approach requiring a detailed TA is agreed by all parties, the current submitted TA is not yet agreed)

Areas of the Draft Masterplan that were Not Acceptable and Required Further Consideration

Therefore, while there were a number of matters which LCC Highways deemed, in general, to be acceptable (January 2019), there were many aspects that were a concern and which required further consideration. These matters as appropriate will be picked up and addressed in detail under the heading 'Comments on 'The Lanes', Pickering's Farm Site Masterplan (August 2020)' below.

Comments on 'The Lanes', Pickering's Farm Site Masterplan (August 2020)

Avison Young on behalf of Taylor Wimpey and Homes England submitted the updated Masterplan documents to SRBC on 12th August 2020. The suite of updated Masterplan documents comprise:

1. Masterplan
2. Design Code
3. Infrastructure Delivery Schedule

The following comments provides LCC Highways views in respect of the August 2020 Masterplan on highways and transportation matters only. It is critical that all matters highlighted are suitably addressed to ensure the acceptable comprehensive development of the site and to demonstrate that it can be delivered with suitable levels of access provided at all stages.

It is not my intention in this response to provide detailed comments on the Transport Assessment (TA) required to support the delivery of this site through the planning process. However, the August Masterplan now includes a series of appended technical statements which includes 'Highways' in Appendix C and as such I will provide appropriate comment on this at this stage on page 13 below under the heading 'E - Highways Technical Note (Masterplan Appendix C)'.

For the avoidance of doubt there is nothing new raised in these latest comments in regard to the general principles of the Masterplan and the position that LCC Highways Development Support has maintained since the pre-application stage. This being that the Masterplan should ensure development of the site follows a properly planned approach and not piecemeal development. Deliverability and viability should underpin the development of

the Masterplan and therefore ultimately demonstrate whether the document(s) are an acceptable basis for the development of the Masterplan site.

The following areas of the Masterplan are not considered acceptable at this stage and further information and evidence is considered necessary. I will address each matter in turn under the following headings:

A - Masterplan Viability and Ultimately Deliverability of the Masterplan

B - Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road

C - Provision for Sustainable Movements

D - Infrastructure Delivery Schedule

E - Highways Technical Note (Masterplan Appendix C)

F - Various other General Comments and Observations

G – Properly Planned Approach as opposed to Piecemeal Development

A - Masterplan Viability and Ultimately Deliverability of the Masterplan

The executive summary of the August 2020 documents states *'This Masterplan has been prepared by Taylor Wimpey and Homes England (the Developers') to guide the future development of one of the largest allocated sites in South Ribble...'*

It remains LCC Highways position that the Masterplan, as presented, does not demonstrate the infrastructure necessary to support the scale of development to be accommodated can and will be delivered.

There is a need to ensure the Masterplan produced has followed an approach which best supports the development and delivery of the entire site and is not overly influenced by seeking to achieve the objectives of any one, or group, of potential developers of the site.

While the final layout of this major development site as set out within the Masterplan may not be unreasonable in many aspects, the delivery cannot be taken as a 'fait accompli', which is essentially the approach adopted and presented in the current submitted Masterplan. LCC Highways consider that a properly planned approach should start from a position that develops the Masterplan based on viability which in turn influences and informs what can be delivered both in terms of infrastructure and ultimately scale of development.

However, there has been no Masterplanning viability exercise and therefore agreed costing (with the LPA with support from the LHA) of the overall infrastructure requirements with specific analysis to best understand how all elements can be funded and what the level of burden to individual developers/development parcels would be with consideration to when measures will be required.

It is of concern to LCC Highways that the approach the Masterplan presents would potentially result in an unrealistic level of burden for latter and almost certainly smaller applications that come forward on the Masterplan site and in doing so would make these unviable.

This is why the fair and proportionate level of burden to be carried by all development must be identified at the masterplan stage, albeit without the level of detail that may be available as site development moves forward, reasonable best estimates can be made at this stage. The No. of dwellings are understood and the ultimate infrastructure requirements as set out in the Infrastructure delivery schedule (IDS) are a reasonable evaluation (in advance of agreement on detailed Transport Assessment). So while the exact trigger points are not known at this stage, and it is understandable why prospective applicants would want to keep a level of flexibility, the overall costing and equitable apportioning of the infrastructure requirements can be assessed and therefore the overall viability of the Masterplan as proposed, clearly understood. If following this comparatively straightforward exercise the outcome is that the Masterplan as presented is sound then we have a strong position from which to move forward to assess individual applications, necessary trigger points for infrastructure, other measures and services etc. to deliver comprehensive development of this strategic site, in a timely manner and in line with the local development plan. This removes uncertainty for future developers and land owners coming forward within the Masterplan area.

B – Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road

A previous version of the draft Masterplan showed in Figure 11.1 the land controlled by Taylor Wimpey (TW) and Homes England (HE) 'the Developers' and also that which is under the control of third party ownership. This is important as it influences how the site may come forward.

The assessment of when the CBLR is required is not simply a question of the number of residential dwellings delivered on the site and the associated trip generation. It is not simply about what the trigger point should be with regard to vehicular traffic. The need and reasons why the CBLR is required is set out in the local plan. It is to support the wider development aspirations of South Ribble BC and allow the comprehensive development of this major site. LCC Highways consider that to do this will require developing a Masterplan that would see the delivery of the Full CBLR at the earliest opportunity with consideration for viability (as set out in section A above), risk (planning permissions) which considers individual site parcels and as necessary the full CBLR including bridge over the West Coast Main Line (WCML).

The specific consideration to the timing of delivery of the Full Cross Borough Link Road must consider the need for appropriate Public Transport routing to/from the principle desire line, which is the Leyland Road corridor. It must consider early delivery of high quality sustainable provision and facilities (3.5m shared use facility on one side of CBLR and a 2.0m footway on other side for the full length of the CBLR tying in to wider infrastructure. These matters are addressed in more detail under Section C below on Page 8. The timing for the full CBLR must also support the comprehensive and sustainable development of the Masterplan site, supporting early delivery of the school and Local centre. The CBLR will provide a key desire line to/from the local centre and school from the wider built environment, in particular from Leyland Road.

Without doubt, a further factor must be assessment of traffic expected to use CBLR. It is expected that evidence to be collected and agreed with the LHA following the opening of 'the Cawsey' section of the CBLR will better inform this matter in due course. (Note: it must be recognised that any data collected at the current time will need to be factored to represent a pre Covid19 base).

In an ideal world a comprehensive masterplan would be fully agreed in advance of any planning applications on site. Clearly the Masterplan should be considered objectively by the

LHA on its own merits. However, in this case we are seeking to reach agreement on a site Masterplan for a major site for which two major applications have already been submitted. Therefore, it is also not unreasonable to consider the acceptability of the Masterplan as presented and the implications in regard to the currently submitted applications. For example, if it is accepted that the currently submitted CBLR application fulfils the local plan policy requirement this would raise the question, what would be the risk to the delivery of the Full CBLR (new bridge over WCML and new junction on Leyland Road).

There is also a need to understand what the implications of 'short term' and 'long term' as referenced in the Masterplan and the applicants outline residential and CBLR applications. Consideration of the outline residential application would imply the applicants consider 'short term' could potentially mean delivery of their 1,100 dwellings in advance of the Full CBLR. **This could imply a time scale of potentially 10 to 15 years before any acceptable CBLR connection to Leyland Road and the subsequent necessary provision for sustainable modes, including PT routing and vehicular access from the east to the school and local centre.**

(Note: the current outline residential application considers 1,100 dwelling out of the 2000 dwellings that could come forward on this major Masterplanned site including safeguarded land; the TA also include a sensitivity test considering 1,350 dwellings, the full site allocation which includes third part land).

The land ownership plan referred to above showed that a site parcel to the west of the West Coast Main Line railway, which is outside of the land controlled by the current applicants (TW/HE), is required to deliver the CBLR. To come forward in line with the Local Plan this site would need to deliver, with no gaps within their site, the section of CBLR to tie in at each end with the land controlled by TW/HE as shown in their current application (i.e. removing any potential ransom).

However, if this site came forward after the current HE/TW site as currently proposed then LCC Highways would have to recommend that a connection from A582 to Bee Lane was not completed as this would not deliver a safe and suitable route to accommodate potential movements, with regard to both vehicular and sustainable movements. The Full CBLR with new bridge and new junction at Leyland Road are necessary to overcome this issue and to deliver the vehicular and sustainable transport facilities appropriate for the scale of development proposed and to accommodate CBLR, local access and redistributed traffic.

Clearly there would potentially be viability issues for this site to deliver the remaining infrastructure to deliver the Full CBLR and therefore the Masterplan fails. The above is just one example, there are numerous potential scenarios where the deliverability of the comprehensive development of the site are put at risk by the Masterplan as presented and the failure to develop a Masterplan based on sound long term viability and deliverability.

Planning permission for the Full CBLR with new bridge over WCML

As highlighted, one of the risks to the current Masterplan is that it promotes an approach whereby a significant proportion of the Masterplan site could be developed in advance of the Full CBLR (and indeed in advance of any planning permission to be secured for the Full CBLR). This would also be in advance of the appropriate level of detailed design to ensure that the land necessary to deliver and construct the CBLR is understood and protected from development.

The risks associated with such an approach are highlighted when consideration is given to the applicants current outline residential application, whereby, land that may be required to deliver the full CBLR could potentially be given permission in advance of fully understanding what the

requirements are in respect to the design of the new bridge and the land required to potentially remove the existing Bee Lane Bridge and construct a new bridge (including all land required to accommodate the associated construction compound and access for plant, storage of materials and siting of a large crane to lift sections of bridge).

The applicant has repeatedly stated that they have excluded the Full CBLR (WCML bridge section and junction with Leyland Road) as it is not in land within their ownership or control. However, this was not an issue for the applicants when submitting their application for the CBLR. The current application shows a route that runs between the proposed new access with the A582 and a priority junction with Bee Lane to the west of the existing bridge of the WCML. The route includes a significant section of land not in the applicants' ownership or within their control. The position the applicants have taken in regard to the Full CBLR has been a concern to LCC Highways from the outset. It is our view that this position has been fundamental to the applicants approach to their Masterplan which has failed to demonstrate that the full route with new bridge and new junction with Leyland Road is viable and therefore deliverable.

It is LCC Highways position that the applicants currently submitted CBLR application does not deliver a CBLR or indeed any road that could be described as fulfilling this purpose, given the sub-standard nature of the provision for both non-motorised and vehicular traffic between the proposed priority junction with Bee Lane and the existing Bee Lane/Leyland Road roundabout. The applicant themselves acknowledge that the proposed scheme would only provide for a limited level of additional traffic. The applicants suggest this could allow up to a further 40 to 50 houses to be served of Bee Lane.

LCC Highways continue to review the amended plans and proposals the applicants have provided in regard to their current CBLR application and outline residential application. However, we have been clear in discussions with the applicant that we do not consider the CBLR application is acceptable as a route to meet the requirements of the CBLR (in line with the SRBC local Plan) and that we would not support the connection of this route to Bee Lane as presented.

C - Provision for Sustainable Movements

I would not describe the current site as a highly sustainable location. It is for the Masterplan to establish the principles of how this site can be brought forward in the most sustainable way, ensuring that the proposals do not result in a car dominated/car dependant development. The detail of the necessary highway, public transport and sustainable links and the timing of their delivery will influence this and will be secured through subsequent planning applications. The Masterplan must ensure that piecemeal development does not compromise the comprehensive development of the site and as such limit the opportunities to deliver a highly sustainable site or undermine the ability to secure/deliver highway changes.

Any development on the site will increase both vehicular and pedestrian/cycle demand toward Leyland Road upon narrow lanes with currently no footway facilities and limited lighting.

I do not consider the Masterplan proposals demonstrate that safe and suitable provision to/from the secondary access points of Bee Lane and Flag Lane will be achieved in what the applicant refers to as 'short term' (note: potentially 10 to 15 years). Given the scale of development that potentially could come forward and the number of vulnerable road users making sustainable movements (with particular reference to education and access to appropriate bus service on Leyland Road) this is a concern.

The absence or delay to high quality provision of sustainable transport measures can hinder development of a sustainable movement mind-set across a development. It is important to maximise the usability of alternative modes of transport to encourage cycling and walking at an early stage in development build-out. Given the length of time it usually takes to develop only a modest number of dwellings, it makes sense to promote sustainable transport use early, with a mix of actual provision and a travel plan for the site. The absence of safe and suitable, high quality infrastructure on the key desire lines to Leyland Road in the early stages of development will lead to a reliance on the car, which could be expected to perpetuate as the development grows. This approach was necessary before the start of the Covid19 situation, but appears even more important in the post-crisis period that we find ourselves in.

In regard to sustainable movements, the Masterplan must therefore address necessary infrastructure and the trigger points when infrastructure is required for sustainable access (pedestrian, cycle, and public transport considering the desire lines and local amenities and attractors). In this respect the Sustainability Plan in Figure 2.2 of the Masterplan document is a useful reference. This clearly shows a dominant draw to/from Leyland Road and the Lostock Hall area for amenities, services, retail, employment and education.

The sustainable links must provide safe and suitable access at all times of the day and throughout the year on well lit, surfaced routes on these desire lines. A simple test to gauge whether routes being proposed deliver safe and suitable access is to ask yourself whether or not you would be happy with your child walking on the route. I address in more detail below the applicants approach which proposes shared use of existing roads within the site which are to remain to maintain required access to multiple existing properties and businesses as 'Quiet Lanes'.

Approach that requires use of Shared Space / Quiet lanes

The principle of the use of 'Quiet Lanes' **as proposed by the applicant for the Pickering's Farm site** has not been developed sufficiently in order for the LHA to consider the approach suitable. It must be understood that the scale of this development, and the phasing as proposed in both the Masterplan, CBLR application and outline residential application could, if approved, mean the final site and all infrastructure will not be delivered for at least 15+ years. So while it may not be unreasonable to use some of the existing lanes in the manner proposed as part of the final plan, it is the long interim period that causes concern. LCC Highways do not accept that the approach presented satisfies NPPF and delivers sustainable development. Consideration must also be given to the latest government advice in regard to shared space and LTN 1/20 in regard to appropriate provision for sustainable users.

The approach presented by TW/HE is to deliver all their site (1,100 dwellings) in advance of the Full CBLR and hence significant intensification of sustainable movements on these existing lanes.

These lanes do not have safe pedestrian footways to cater for existing and new users (including attraction from beyond the site) for:

- Children going to the nearest schools (Penwortham Broad Oak Primary School and Kingsfold Primary School both to the north, Lostock Hall Academy, Lostock Hall Community Primary School, Our Lady and St Gerards RC Primary School to the east and Farington Moss St Pauls C of E Primary School - to the south of the site;
- Elderly and mobility impaired users; and
- Parents with pushchairs etc.

Traffic speeds on these, predominantly long straight lanes (currently derestricted and which will remain semi-rural for many years - even after development has commenced from the

western edge) will not be self-enforcing to ensure that they are below the 20 mph maximum required. Clearly many sections of the proposed lanes will not be developed until much later in the development build out. Many of these lanes are unlit or have limited lighting provision and therefore do not present a suitable route at all times of day and throughout the year.

The desire lines via the existing lanes (Bee Lane, Lords Lane and Flag Lane) do not present acceptable shared use routes. The Masterplan needs to demonstrate that the site can be brought forward in a safe and sustainable manner from the early stages. I consider the current Masterplan fails to do this!

I consider the approach will need to give much greater consideration to review of the current use of existing lanes and current access of existing properties and how these may need to be altered to create the necessary safe pedestrian environment. The approach will need to identify how pedestrians can be segregated from vehicular traffic (footpaths or off road provision on desire lines).

It is clear that as the site is built out and phases are brought forward (with new access and highway/sustainable movement access infrastructure) the traffic management measures on the existing lanes will need to be reviewed and amended. This approach is necessary with delivery of development on a large site where multiple existing properties and the existing access routes are to be retained.

It is not clear what consideration has been given to equestrians as part of the Masterplan.

PROW

There is an extensive network of Public Rights of Way that run through or adjacent to the proposed site and improvement of these existing facilities as well as provision of new links could be expected to deliver sustainable development.

I would expect to see full assessment of any proposals that impact existing PROW and associated mitigation measures as part of any submitted planning applications on the site. Any cost associated with changes to Public Rights of Way as a result of the proposed development will need to be borne by the developer, whether physical measures or the legal procedures.

Access to Public Transport and Future Public Transport Routing

In the early phases of development prior to any penetration of public transport into the site there will be substantial walk distances to access PT services. These services will be accessed on the primary PT corridor on Leyland Road

Walk distances of between 1200m and 1400m to the nearest PT stops on Leyland Road and 600m and 700m to stops on Kingsfold Drive, these will be typical walk distances for the residents of the dwellings delivered in Phase 1 of the proposed Masterplan. These distances would not be considered acceptable in most circumstances. Guidance highlights a maximum walk distance of 400m to a bus stop. Where the provision for pedestrians is considered poor the distance creates an even greater barrier to achieving sustainable development (see above regarding the need for safe walking routes for all users (including mobility impaired), lit, with appropriate surfacing and suitable for use at all times of day and throughout the year.

The masterplan indicates in the long term future penetration by public transport into the site with potential access from A582 Penwortham Way, Kingsfold and Bee Lane. However, the initial proposals suggest PT routing only via the main site access via A582 Penwortham Way. Such a diverted service would disadvantage existing users and is not acceptable to the highway authority. This strategy is unlikely to be sustainable post any PT funding. Clearly the

ideal public transport route would use the CBLR linking the built environment of Lostock Hall, Tardy Gate, and Kingsfold and further afield using the Leyland Road Quality Bus Corridor. Any new services or service extensions/diversion will need to be funded by development and should be delivered as early as possible in the site build out to promote PT use and site sustainability.

The potential impacts of on-street parking on PT routing should be considered in the development of the Masterplan. As a minimum, adequate parking provision will be required to ensure PT service reliability can be maintained.

I note that potential travel plan measures are now included within the revised Access and Movement (section 6) of the Masterplan document and in the IDS.

D – Infrastructure Delivery Schedule (IDS)

The Masterplan includes an Infrastructure Delivery Schedule Document (IDS). The applicants have stated that The Masterplan, Design Code and IDS have been prepared to require comprehensive development to come forward within the site on land owned and/or controlled by the Developers and on third party land. The IDS now seeks to provide commentary on how the latter phase of the site would be delivered and some further information on the delivery of the CBLR on third party land and the railway crossing is provided in the table on page 6. The IDS and the accompanying table on page 6 has been updated to provide an indication of which infrastructure elements could be delivered through S106, CIL, S278 and S38 agreements (it is important that the IDS is complete in all matters and should highlight that delivered directly by development (and where possible having regard specific plots/sites) or by other means, this removes any future ambiguity).

However, as previously stated there is no costing estimate/consideration for viability and the timing for the delivery of this infrastructure remains open ended (LCC Highways has concerns in regard to masterplan viability, Full CBLR design, new bridge and junction with Bee Lane, scheme cost estimates and planning requirements, including agreed responsibility for delivery).

Access Strategy

The Masterplan for the site indicates vehicular access will be taken from a number of new vehicular access points at the following locations:

- A582 Penwortham Way
- Bee Lane onto Leyland Road
- Flag Lane onto Leyland Road
- Coote Lane; and
- A proposed bus link to the northwest of the site towards Kingsfold

Street Hierarchy

The primary spine road from A582 is proposed as a 7.3m wide carriageway with 2m footway on one side and a shared 3.5m wide pedestrian/cycleway on the other side. This shared pedestrian/cycleway will link into the wider A582 dualling provision.

The detail of the secondary access to the site has not been agreed. LCC Highways have been very clear that the current standard of Bee Lane and its access with Leyland Road will only support a limited level of new trips. The impact of increased vehicular movements on sustainable movements will need to be evaluated and will require appropriate mitigation

measures from first occupation of the site to ensure safe access routes to the primary public transport corridor on Leyland Road and wider local amenities.

The current layout of the Leyland Road/Bee Lane roundabout is adequate for the current very light vehicular use from Bee Lane. However, the arrangement over the bridge and the junction layout is not to satisfactory standards to support any significant uplift in traffic numbers. Therefore, while the junction could possibly support a small increase in vehicular movements, this would not be supported until all matters are satisfied and highway changes agreed.

Proposals to date have not suitably addressed how the Bee Lane access and adjacent bridge crossing over the West Coast Main Line (WCML) will accommodate the combined addition of vehicular and sustainable movements that could be expected to be generated by this proposal in the interim period (which with consideration to the phasing proposals is potentially 15+ years) prior to delivery of the full CBLR and new junction at Leyland Road.

'Short and Long Term'

The text in the Access and Movement section (Section 6) of the Masterplan document refers to 'Short' and 'Long Term' options. I consider this phrasing without greater clarification to be, at best vague and potentially misleading.

Short term and long term vehicular access options connecting to Leyland Road in the north eastern corner of the site are proposed. The short term option is a priority 'T' junction arrangement connecting the CBLR extension to Bee Lane utilising the existing Bee Lane bridge to connect to Leyland Road. The Masterplan proposal is that the short term access option will be restricted to use by existing properties on the site and 40-50 new dwellings. The long term option is a new bridge over the WCML connecting the CBLR extension with Leyland Road.

An indicative access option (bus only link) is shown for the Kingsfold Drive link on page 33 of the Masterplan. LCC Highways have repeatedly indicated that there are advantages in an all vehicular access on a circuitous route for a limited level of local traffic.

Proposals are also shown for access via Flag Lane. The proposals provide sub-standard provision for vehicular and pedestrian access over the bridges. The limitations of the Flag Lane access proposals would only accommodate a limited level of movement.

I consider the reference to 'short term' in the Masterplan misleading. Based on the currently submitted outline residential application, acceptance of the Masterplan as presented would clearly indicate 'short term' to be up to 1,100 dwellings or 10 to 15 years. Restriction of total numbers on Flag Lane appears simple only if the final full Masterplan infrastructure is built out and considered. However, given an interim potential 'short term' of 15 years (assuming somehow a suitable mechanism is identified to fund the necessary infrastructure) this presents numerous questions in regard to access for both existing and new dwellings. If a properly planned approach is not developed, it could be expected that at every opportunity future developers will seek to secure development without the burden of the infrastructure needed to complete the full CBLR. This will lead, as can be demonstrated on many other sites over the years, to significant delays in the release of the wider site. This has implications for the comprehensive development of the site and early delivery of key components of the Masterplan such as the school and local centre.

Therefore as highlighted in this section above, the IDS needs to go further than simply identifying the 'final' necessary infrastructure. In regard to the IDS, access to the local centre and proposed school should be addressed, again considering the necessary infrastructure

and the potential trigger points as to when this infrastructure will be required, both from within the site and from the wider external built environment into the new local centre and the proposed school.

I would note that following discussions with the LEA, the school site has been moved further to the north and is to be accessed off a secondary road. A drop off parking facility for the school is also shown on the revised Masterplan document on page 2;

Access to school site in its new location, utilising Bee Lane would be a very attractive proposition for parents dropping of a child. In the potential 10 to 15 years 'short term' that could result given the Masterplan approach presented, this would prove very difficult to control and could result in even greater issues at the Bee Lane/Leyland Road junction.

In section A above, the requirement to underpin the Masterplan with consideration for overall viability was highlighted. The overall infrastructure requirements, their costings, delivery and viability have not been considered by TW/HE to date. Validation of the Masterplan should aim to ensure that proposals are equitable and fair to all developers/landowners. With consideration for the phased build out of the masterplan site it is also important to demonstrate validation of the phasing, costing and necessary infrastructure delivery. The Masterplan validation will therefore also require consideration of triggers for indicative delivery of infrastructure associated with phased build out. Once this assessment is provided the LHA and LPA will be in a position to better understand how the development of the site can come forward over the entire period of the build out.

E - Highways Technical Note (Masterplan Appendix C)

In seeking to address some of the comments received in earlier consultations, which requested that further detailed technical information be included in the Masterplan, the main Masterplan document now includes a series of technical statements appended addressing; highways (Appendix C), ecology (Appendix D), Flood Risk and Drainage (Appendix E), and Landscape (Appendix F). Reference is provided to these technical appendices throughout the main Masterplan document.

Traffic and Highway Network Conditions (Pre Covid19)

The immediate existing highway network on both the east and west side of this major application site presents challenges in supporting sustainable development. Leyland Road is one of the most congested corridors in the area, not only during peak periods but at many other times of the day and at weekends.

On the A582 corridor there have been a number of recent junction upgrades as a precursor to the proposed dualling scheme, however, the A582 still experiences queuing and delay during peaks for extended periods at pinch points. The need for both the A582 dualling scheme and the CBLR to support further development aspirations has been well documented for many years.

The traffic assessment produced by the applicants to date, including that which is presented to support the Masterplan in Appendix C, is not accepted by LCC Highways. The network information does not reflect the congestion and delay experienced on a daily basis (Pre Covid19) by regular and familiar users of the network. The validation of Base Models is not accepted. Discussions are ongoing in regard to this point and the applicant has indicated they will be carrying out further work to address concerns.

While some elements of the Transport assessment have been agreed, such as the development trip rates (they are consistent with rates approved elsewhere in the district/and within NW Preston), the forecast traffic assumptions are not agreed. There are issues that have been identified and which need to be addressed in regard to committed development traffic and potential CBLR distribution/re-distribution. While the applicant has considered and included their views in regard to committed development, a number of issues have been highlighted and as presented this is not acceptable. Discussions are ongoing in regard to this point and the applicant has indicated they will be carrying out further work to address concerns.

The CBLR will provide a key desire line, not only for sustainable modes but also for private cars, to local employment, retail and other amenities. It has been established and agreed with the applicant that at least 40% of the full site traffic would wish to route via Leyland Road and for local site traffic to access CBLR (Cawsey to Carwood Road and the A6 and Preston east, Walton-le-Dale and Bamber Bridge). Without doubt, a further factor must be assessment of local traffic expected to use CBLR. Evidence to be collected shortly following the opening of 'the Cawsey' section of the CBLR will better inform this matter in due course.

The Transport Assessment (TA) produced for the outline residential application will assess the impact and level of development that ultimately can be delivered. This must relate directly to delivery of infrastructure and when this will be necessary to mitigate the assessed impacts.

F - Various other General Comments and Observations

The text in the final paragraph of Masterplan section 6 - Access and Movement section (Section 6) states 'The strategy has been discussed with LCC during the various meetings and liaison described in the consultation section...', this implies that the approach has been developed in consultation with LCC Highways and in so doing has been agreed. While I would agree that the matters have been discussed as part of the consultation process LCC Highways have made our views clear as demonstrated by the extensive comments above setting out our continued concerns. As such the phrasing is considered somewhat misleading.

Parking and proposed 3G Sports Pitch

Although not within the site, a new 3G sports pitch is proposed on the existing pitches adjacent to the existing Community Centre at Kingsfold. There is a reasonable level of parking at present, however, consideration will need to be had for changes (highway link and intensification of use) in regard to appropriate parking provision. In delivering the highway link this can be expected to require other changes that require the support of the Penwortham Town Council.

Existing Rights of Access

The site is currently occupied by a number of individual properties in private ownership which are accessed via Bee Lane, Flag Lane, Lords Lane, Moss Lane and Nib lane. Previously in our comments LCC Highways noted the following:

- There is a need to ensure all existing rights of access are maintained or acceptable/appropriate alternatives provided, including safe access for sustainable modes;
- The developer should review all affected properties to ensure there are no existing covenants that could restrict potential to implement future proposals/access changes.

Having regard to the above, it is not clear whether the applicant has given this any further consideration. On page 33, within the Access and Movement section the Masterplan simply

states, *'All existing rights of access will be maintained with acceptable alternatives provided where appropriate'*.

While LCC Highways has been provided with some plans showing potential proposals and options for the stopping up of the individual lanes and creation of turning heads to control access, while maintaining local access, this does not explicitly address the concern raised. LCC Highways have seen at least one letter from a resident in response to the consultation that suggests they have access rights in their title deeds along Nib Lane. Existing access rights may prevent the delivery of the Masterplan proposals as presented and the changes and use of the rural lanes as required by the applicant and the approach presented in the Masterplan.

(Note: where a stopping up/diversion is required in order to implement a planning permission the stopping up/diversion is carried out under the Town and Country Planning Act. The decision on whether an order will be granted is made by the Secretary of State.

Network Rail Consultation

This next section addresses matters that relate to the LHA and Network Rail. A response to the Outline application and CLBR application submitted by TW/HE was provided on the 2nd of March 2020 and reference is made to those comments. At present LCC is not aware that these concerns have been addressed. A number NR's concerns are shared with the LHA and are yet to be addressed to our satisfaction.

The uplift in traffic over the bridge is a matter of concern for Network Rail and the LHA. It should be noted that Network Rail make this comment in reference to the full CBLR being constructed. Comments have not been provided on what Network Rail would consider an acceptable level of traffic. It is stated that the Railway bridge 113 (Bee Lane), maintained by Network Rail, suffers from settlement and the condition of the bridge is likely to deteriorate if utilised for increased traffic loading. Notably, Network Rail state, ***'in its current state the bridge is unsuitable for a proposed link road'***. An objection has been raised pending an assessment of the bridge and the LHA making a commitment to taking ownership of the bridge. These, including the latter, have not been overcome.

The Masterplan has not been updated in light of those comments submitted, and does not provide a clear picture of the additional impact that could be accommodated on the bridge, nor explaining adequately to whom the cost, responsibility and ownership will fall. A costed estimate is not included, the strategy for delivery is not presented. There is no demonstration of the level of traffic that could be tolerated by Railway bridge 113 in the short term (having regard for the potential 10-15 year short-term as previously raised). Whilst a Masterplan typically deals with 'broad' details, these issues raised by Network Rail and how it is proposed to overcome them have a significant influence on any applications coming forward, and fundamentally, the ability of authorities to accept the risks presented and agree the impact of development has been managed acceptably. It is not in the public interest to accept a Masterplan with this information missing due to the possible consequences if this detail is overlooked at this stage. The consequences include, but are not limited to, issues with the WCML and train services caused by bridge structural issues; access for sustainable users falling short of those required (even if this is serving only a small number of vehicular movements, it could serve the entire site in terms of active travel); access being maintained; public cost if the bridge is not adequate, fails, or is damaged; inability to appropriately manage traffic into the site (including consideration for potential construction traffic); inability to prevent heavy parking up on this lane; the cost associated with these effects. These can to some degree be designed out from the outset and that is in part the role of the Masterplan to outline how these risks will be eliminated. The residual issues are a risk that are taken on by the LHA and Network Rail.

In considering the implementation of a new bridge, regard needs to be had for the layby requested by Network Rail in order to maintain access following an uplift in traffic (see NR comments). Additionally, bridge alignment; removal of the old bridge; construction requirements and crane siting etc. will all require consideration in order to provide assurance that the works can take place and the Masterplanned site can come forward in a way that does not cut off access for existing residents. This detail is not provided and the potential issues are not assessed because the proposal lacks the information to adequately identify what the issues will be, when they will occur, or how they will be overcome.

Once these matters have been considered adequately, it may be possible for the LHA and Network Rail to reach agreement.

Access to Holme Farm Dairy and other existing Commercial uses on the Site

In regard to access to Holme Farm Dairy, I note the previous draft Masterplan stated that following consultation a direct link from Holme Farm Dairy to the new road access will be provided. As previously highlighted, all access points will need to consider the existing commercial land uses and be constructed where necessary to appropriate commercial vehicle standards.

Sustainable Urban Drainage Systems (SuDs)

LCC are the Lead Local Flood Authority (LLFA) and as would be expected, LCC Flood Risk Assessment (FRA) team have been consulted separately. I note that FRA provided formal comments, dated 12th March 2019.

Clearly, the development of the Pickering's Farm site application should consider the requirements likely to be asked for in support of a SuDs drainage scheme. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance.

In regard to the Masterplan proposals I would note that, in general, LCC will seek to limit the use of culverts where alternative sustainable solutions can be found.

G – Properly Planned Approach as opposed to Piecemeal Development

With consideration for all the comments and concerns raised in sections A to F above It is LCC Highways view that the Masterplan approach proposed by the applicants (TW/HE) is likely to result in piecemeal development. Albeit one large site accessed from of A582 Penwortham Way and a series of smaller sites served of various other secondary access locations a number of which as presented would be sub-standard in regard to both vehicular and sustainable access provision.

LCC Highways consider that approval of the Masterplan as submitted would allow the currently submitted applications to proceed toward a decision on the basis that it is not necessary to understand how the final Comprehensive Masterplan site infrastructure will be delivered.

The current outline application highlights that they do not prejudice the delivery of the Masterplan, including the CBLR, but that its full delivery is not within their control. Rather than starting from a position of what is necessary for this Masterplan site and then addressing how this will be delivered, the Masterplan development has been primarily focused on presenting an approach which satisfies the objectives of TW/HE and their current submitted outline application for up to 1100 dwellings.

It is of concern to LCC Highways that the approach the Masterplan presents would likely result in a level of greater burden for later applications that would come forward on the Masterplan site, making these potentially unviable. With piecemeal development each later emerging parcel of development is unlikely to deliver the infrastructure requirements. This is likely to result in planning 'stand-off' and potentially a series of Public Inquiries where future development applications would argue their comparatively small impact does not warrant the unreasonable burden being requested.

This is why the fair and proportionate level of burden to be carried by all development must be identified at the masterplan stage, albeit within reasonable best estimates available at this early stage. The number of dwellings are understood and the ultimate infrastructure requirements as set out in the IDS are a reasonable evaluation (in advance of agreement on detailed Transport Assessment).

(Note: so while the exact trigger points are not known at this stage, and it is understandable why prospective applicants would want to keep a level of flexibility at this stage, the overall costing and equitable apportioning of the infrastructure requirements can be assessed and therefore the overall viability of the masterplan as proposed. If following this comparatively straightforward exercise the outcome is that the Masterplan as presented is sound then we have a strong position from which to move forward to assess individual applications, necessary trigger points for infrastructure and services etc. to deliver comprehensive development of this Strategic site in line with the Local development plan.)

The Masterplan is the document to ensure piecemeal development does not come forward on this site. As presented this masterplan does not provide the clear path to delivery of the Masterplan site, but does support the applicants currently submitted planning applications. The matters raised in these comments are not new they have been raised by LCC Highways and others previously and while there has now been numerous updates to the Masterplan, fundamental issues remain outstanding.

Summary and Conclusion

These comments consider the Masterplan (August 2020) and present highways and transportation matters identified as potentially significant issues that should be given further consideration and addressed within an updated and agreed Masterplan for the site. The final Masterplan should then inform all currently submitted and subsequent planning applications.

LCC Highways consider the following areas of the Masterplan are not acceptable, as set out in detail in the comments above. Further information and evidence is considered necessary, this includes:

A - Masterplan Viability and Ultimately Deliverability of the Masterplan

B - Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road

C - Provision for Sustainable Movements

D - Infrastructure Delivery Schedule

E - Highways Technical Note (Masterplan Appendix C)

F - Various other General Comments and Observations

G – Properly Planned Approach as opposed to Piecemeal Development

All the above will influence the delivery, scale and viability of development that can be brought forward on this important site. As correctly set out in the SRBC Local Plan, '**comprehensive development of the site is crucial to ensure delivery of essential infrastructure and local services.**'

LCC Highways have reviewed the submitted Masterplan Plan and associated documentation and considers that further information is necessary to demonstrate the Masterplan, is considered sound by the highway authority, can and will deliver necessary and appropriate infrastructure and sustainable links with connectivity to the wider network at the time required to support comprehensive development of this major site for development while satisfying relevant policy.

If the above matters are suitably addressed within the final Masterplan this will allow a clear understanding of how the site could come forward. From a highways and transportation perspective this will mean that an appropriate Transport Assessment can be developed to establish the full impacts of the overall proposals and therefore the measures and mitigation necessary to deliver sustainable development in line with the latest local and national planning policy (NPPF). In addition, the Masterplan will inform appropriate assumptions on phasing and delivery that will support analysis of the short, medium and long term scenarios that will be required within the Transport Assessment to establish impacts and necessary infrastructure and measures as each phase is brought forward.

Therefore, I would recommend the application is considered but the decision deferred in order that the applicant may engage with the planning authority, taking on board planning committee recommendations, and also the views of LCC Highways with the aim to address the matters highlighted in these comments.

If a planning decision is to be made at this stage our recommendation must be one of refusal with the reason being lack of necessary information and not satisfying relevant policy.

I hope the above is of assistance.

Yours faithfully



Neil Stevens
Highways Development Control Manager
Community Services, Lancashire County Council