

PICKERINGS FARM SITE, FLAG LANE, PENWORTHAM, LANCASHIRE, PR1 9TQ

**Planning Application Ref: 07/2021/00886/ORM
& 07/2021/00887/ORM
Planning Inspectorate Ref: APP/F2360/W/22/3295498**

**SUMMARY OF EVIDENCE OF
Neil James Stevens**

TRANSPORT

LANCASHIRE COUNTY COUNCIL



1.0 Qualifications and Experience

1.1. I am a Bachelor of Engineering, with Honours in Civil Engineering from Bolton Institute of Higher Education and a Master of Science in Transport Planning from the University of Salford.

1.2. I am the Strategic Highways Planning Manager of Highways Development Control in Highways and Transport, Lancashire County Council (LCC). I have over 25 years' experience in Transport Planning and the assessment of highway impact from major development proposals.

1.3. The evidence which I have prepared and provided in this proof of evidence is correct and I confirm that the opinions expressed are my true opinions.

1.4. The evidence that I present covers the following:

Section 2 Application Background

Section 3 Policy, Guidance and Plans

Section 4 Highways and Transport – Reasons for Refusal

Reason for Refusal 1 and 2: Modelling Methodology (RfR 1) and Transport Assessment and Technical Evidence (RfR 2)

Reason for Refusal 3: Highway Infrastructure Bee Lane Bridge

Reason for Refusal 4 and 7: Cross Borough Link Road Delivery (RfR 4) and Policy A2 and CBLR Delivery (RfR 7)

Reason for Refusal 5: Policy C1 and Masterplan

Reason for Refusal 6: Phasing and Infrastructure Delivery Schedule

Section 5 Lancashire County Council's Assessment of Transport Impact - Technical Assessment

Section 6 Summary and Conclusion

2.0 Application Background

- 2.1. Application A with application number 07/2021/00886/ORM (now Appeal A) is described as follows: ***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 building.***

- 2.2. Application B with application number 07/2021/00887/ORM is described as follows: ***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.***

- 2.3. Lancashire County Council takes its responsibility seriously with respect to the current and future use of the highway network whilst also giving a high priority to supporting growth, including supporting private sector led economic growth, the creation of jobs and access to employment, education and training.

- 2.4. The existing highway conditions on the network surrounding the site have been assessed by LCC and it is clear that there are some locations on the A582 and B5254 Leyland Road corridors where traffic congestion occurs at peak times.

3.0 Policy, Guidance and Plans

- 3.1. This section highlights national and also local policy that is relevant to the transport impacts of this proposal.

4.0 Highways and Transport – Reasons for Refusal

- 4.1. To maximise the level of development that can be suitably accommodated with the comprehensive development of this local plan site, I consider necessary Infrastructure changes should be identified through, firstly:

- I. An agreed Masterplan; and then
- II. An acceptable transport assessment that provides a reasonable basis to determine impacts and necessary highway/transport changes.

4.2. I consider an agreed Masterplan for the comprehensive development of the whole site has not been provided. The Masterplan would identify all changes necessary to support the scale of development appropriate for the comprehensive development of the site. This work has not been done. The Appellants approach has been that this is a matter to be picked by others that come forward later. This is not a properly planned approach or in line with Local Policy C1.

4.3. Under the Reasons for Refusal, I set out that the current Masterplan is insufficient in detail and that the comprehensive development of the site is not suitably addressed in the Appellants Transport Assessment. I then set out the key failings and flaws within the Appellant's current masterplan and what harm this results in, these include:

- Traffic and safety impacts for vehicles and sustainable users across Bee Lane bridge;
- The shortcomings of the access strategy comprising a large 1060 dwelling cul-de-sac for vehicular access; this undermines the existing road hierarchy; does not provide appropriate connectivity and efficient access to local amenities; is not considered inclusive design with consideration for all users, including those with mobility impairment; is not in line with NPPF;
- the failure to clearly demonstrate and understand what is required for the comprehensive development of the site and delivery of the CBLR;
- The Masterplan is not agreed; when agreed it would determine the movement strategy for all users across the site including vehicular through movement, pedestrians, cyclists, and Public Transport; without an agreed Masterplan the Appellant's movement Strategy and subsequent Technical Assessment is inconsequential;
- The shortcomings and safety concerns of the current Masterplan in regard to the appellants shared space approach to the existing lanes (Bee Lane in particular); and;

- The lack of clear understanding and detail that the Appellant has given to the access and location of the school site, and the further potential traffic and safety impacts that can be expected to result along Bee Lane.

- 4.4. I consider the current Masterplan should be rejected as it fails to ensure current applications can be delivered without prejudicing future development.
- 4.5. The failings of the Masterplan in regard to identification of safe and suitable infrastructure is born out under Reason for refusal 3 – Highway Infrastructure Bee Lane Bridge. Under this RfR, I set out the constraints of the Bee Lane Bridge and the failings of the appellant's proposals to provide safe and suitable access for all users.
- 4.6. In regard to the Appellants proposals for Bee Lane, the Bee Lane Bridge and Bee Lane/Leyland Road junction, I consider these result in unacceptable impacts on existing and new users of the highway network. In my evidence I have highlighted safety concerns for vulnerable road users on the shared use lane, inappropriate level of infrastructure provision for cyclists across Bee Lane Bridge and at the Bee Lane/Leyland Road junction that I consider would result in severe impact and be contrary to the NPPF.
- 4.7. The Appellant has a very ambitious vision in regard to sustainable transport. However I consider their proposals for all modes over Bee Lane Bridge and for public transport are poor. I consider the proposals fail to meet NPPF in particular Paragraph 110 and 112.
- 4.8. Under Reason for Refusal 1 - Modelling Methodology and Reason for Refusal for Refusal 2 - Technical Assessment and Technical Evidence I present evidence to demonstrate that both LCC Highways and National Highways are in agreement that there was a lack of information available that would allow both highway authorities to reach an understanding of the impacts of the proposals.
- 4.9. In my evidence under RfR 1 and RfR 2 I set out the reason why elements of the information that was available was not acceptable to the highway authorities, including base traffic data, the modelling approach and assumptions underpinning

the Transport Assessment that were not acceptable. The National Highways review of the Microsimulation model concluded that:

.....we cannot conclude that the model accurately reflects the operation of the wider model network and therefore the model is not suitable for assessment use'.

4.10. LCC Highways and National Highways considered view was that it was not possible to determine the impacts of the proposal from the Appellants Transport Assessment. The Appellant's TA was not considered a reasonable basis upon which to assess the applications.

5.0 **Lancashire County Council's Assessment of Transport Impact - Technical Assessment**

5.1. Consequently, Lancashire County Council and National Highways have had no option and have been required to undertake our own assessment. The technical assessment undertaken by LCC/NH and presented in section 5 of this evidence is a clearly auditable assessment. This shows a clearer picture of the base situation and resulting greater impacts on the A582, particularly between Tank roundabout and the A6/M65 signalised roundabout. The LCC/NH assessment highlights the clear need for improvements on the A582 even without further development.

6.0 **Section 6 Summary and Conclusion**

6.1. I consider the evidence that I have provided leads to the conclusion that the appeal applications should be refused. It has not been demonstrated that the modelling methodology or the scoping and composition of technical supporting evidence of the submitted transport assessment is acceptable. As such it has not been demonstrated that the proposed development would not have a severe adverse impact on the local highway network. The proposed improvements to the Bee Lane bridge are not considered sufficient with the additional traffic, as well as increased numbers of pedestrians and cyclists resulting from the development, prejudicing highway safety and pedestrian and cyclist safety. The application fails to provide adequate certainty that the section of the CBLR within the site, together with the necessary physical upgrading works to the Bee Lane bridge, will be delivered. Contrary to policy C1 of

the South Ribble Local Plan a Masterplan and design code for the comprehensive development of the site has not been agreed.

6.2. I therefore submit that the development should be refused on transport grounds.