

Mike Bowe

Keep bee lane rural intro. Rev 10

As my colleague Graham Eastham has said we are a disparate group of concerned residents, we have no particular expertise in the subject of development planning but have sufficient local knowledge and life experience to realise that the proposed development appears deeply flawed.

We fully support South Ribble's unanimous decision in refusing this development and subsequent defence of that position in this appeal process. We also fully support LCC Highways and Network Rail in raising major concerns regarding traffic impacts. We have confidence the inspector will take full account of residents concerns of which there are many.

We would urge the inspector to pay particular regard to the evaluation of the traffic impacts. We are sure the inspector will remain grounded, and not be seduced by the Vision and validate theory and hypothetical scheme aspirations.

Firstly to the layman it appears highly unusual for Vectos to complete their assessment without agreement on methodology with the local Transport Authority who have a legal duty to secure the expeditious movement of traffic on the authorities road network. In other words LCC highways cannot abdicate their legal responsibility to a third party. Vectos appear to have failed to appreciate this fact.

This lack of consensus has thrown considerable doubt on the validity of the Vectos conclusions.

The Vectos Vision and Validate approach appears highly idealistic. In a nutshell the majority of residents either cycle, walk or take the bus to school, or their health appointments, or to work or to shop, road traffic impacts are thus minimised and everyone lives happily ever-after. It fails to account for the impact of dark mornings and nights, poor weather, child safety concerns, poorly lit footpaths, existing road congestion and poor quality infrastructure. To function it requires adequate local social infrastructure, excellent sustainable transport links and significant local employment. To the layman it appears that the approach is an experiment to be conducted on the local population without consent or proper contractual commitment, it is a complete act of faith.

For example it is inferred that road traffic demand will be suppressed by the availability of a large number of local schools. Again we would urge the inspector to satisfy himself that local education capacity has been properly assessed. Many of the claimed local schools are more than two miles away and or at close to or full capacity. Many of the local schools claimed to be within the development catchment are in fact closer to other large committed developments, so there will be considerable competition for local places, and little spare capacity.

Unfortunately the LEA employs an as the crow flies radius to define education catchment. Given the size of the site, and its single main point of access on the western side and with many of the claimed catchment schools to the east of the site this does not appear to be a credible approach. Many of the claimed catchment schools will only be accessible by car because they are more than 2 miles away, via busy roads. Many of the claimed catchment schools will have no available capacity and or are closer to large committed developments. The claim that it is acceptable for children under 8 to walk up to two miles to school and over 8's three miles is questionable.

Because of the size of the site and the Vision and Validate approach it is surprising that there has been no site specific evaluation of population demographics to assess demand for local services and to test available capacity. We estimate the site population to be 3,643 of which 1,850 are of working age, 493 are pre-school, 523 are primary and 307 are secondary school children. Note for context the population of Penwortham is 23,000. We are concerned that there has been no account made of the population impact of the 30% social housing. This appears to be a significant factor strongly influencing child yield.

As a result we believe that primary school and secondary school populations and resulting trip rates may be seriously underestimated by Vectos. We believe that the trip impact for pre- school provision has been entirely omitted. This is a significant failing.

We also have concerns regarding the evaluation of commuting and leisure trips. Given the location and size of the site we would question the assumption that 43% of commuting trips are less than 5km (3 miles). We estimate that the site will have a working population of 1,584, and question the source of local employment that would accommodate 680 jobs.

Analysis of the City deal has shown that since inception the City deal region has built over 7,000 Homes, yet strangely, in the region there has been no net increase in business rate collection, or private sector jobs creation from inception to the start of the pandemic. One possible explanation is that many of the jobs are located outside the City deal region, with many of the major housing developments located close to motorway junctions specifically to provide dormitory housing.

We believe that this site is also designed to provide dormitory housing with a location close to the M6. It appears that local housing need will be saturated as South Ribble has more than ten years housing supply. We do not consider a 43% local journey split credible. We believe that the commuting trip rate is a significant underestimate.

We also have significant concerns relating to the estimation of leisure trips. Vectos claim this category covers ...walking the dog, shopping for a pint of milk etc. The reality is that this covers all forms of shopping, shopping deliveries, banking, holidays, religious service, visiting friends, sport, entertainment etc. Vectos claim 50% of such trips occur within the site boundary and are thus discounted, but provide no justification. Again we find this assumption lacking in credibility and as such we suspect that leisure trips have been grossly underestimated.

We are concerned that existing congestion on local roads will make the provision of sustainable transport unattractive/non viable to users. Locals will tell you that congestion and traffic volume on Leyland Road, Pope/Cop lane, Coote lane, and Penwortham Way makes cycling positively dangerous. For the Vision and Validate approach to work there needs to be significant investment in local education, health and leisure facilities, there needs to be a significant improvement in local employment prospects and properly designed segregated cycle paths and pedestrian crossings. There needs to be a firm contractual commitment to reliable, regular local bus services. In other words the Vision and validate objective cannot be achieved on a shoestring. We believe that there is insufficient local infrastructure to sustain a population influx of 3,643 persons and the Vision and Validate concept will fail, and local roads will gridlock as residents are forced to travel further afield for key services.

We would urge the inspector to carefully consider the impact of the lack of the Cross Borough Link Road. In essence the site becomes a cul de sac with only one main route for access via the A 582. The local impact of the development during construction and occupation is likely to be profound. Indeed very little has been mentioned about disruption on the A582 during construction which could extend over ten years. All users will recognise that the A582 is currently severely congested especially during peak hours. We are sure Neil Stevens will expand on this issue in the coming days.

Our understanding of the City deal Finances lead us to believe that there is very little prospect of the A582 widening being completed in the foreseeable future.

The Bee lane Bridge is another area of concern. Network rail sum up the concerns of Keep Bee lane rural perfectly "The notable increase proposed in mixed use traffic will increase the risk of accidents/incidents occurring on the bee lane bridge" and further state "while the probability of an accident occurring on the bridge might be considered low, the subsequent disruption to all users could be significant" and the "Bee Lane Rail over bridge is currently unsuitable for increased highway and pedestrian traffic flows. The project should be required to show that a new rail over bridge spanning the west coast Main line could be constructed on an alignment which facilitates access to the development...."

To be clear this bridge was designed to accommodate a farm track with a width of 5.56 m. It is now intended to provide two way access for vehicles, cyclists and pedestrians. Given a large car is 1.9 m wide and there is a requirement for vehicle clearance and a pedestrian safety margin that leaves less than 0.7 m for pedestrian access. Given a delivery van is likely to be 2.2 m wide and typical double buggy is 0.8 m wide the intended purpose does not appear remotely feasible, and KBLR consider this a major safety concern.

We have serious concerns regarding the Flood prevention design. The artificial flood basin at the north end of the site has a capacity of approx 16,000 cubic metres. It is concluded that approximately 32,000 tonnes spoil will be excavated to achieve this capacity. We believe that this spoil will be employed to construct raised earthworks to the south of this basin with a "minimum level of 0.63 m above the predicted 100 year event water level". A drawing by McCloy in Appendix 11.1 shows the raised earthworks. This drawing shows several existing properties partially or completely surrounded by the raised earthworks. As well as adversely impacting the visual amenity such significant changes to topography are certain to increase flood risk and may make the properties uninsurable.

Equally disturbing is the figure 4.15 in appendix 11.1 that shows the design of the flood basin and the raised earthworks to the south act to preferentially flood Kingsfold to the North, in effect sacrificing Kingsfold to save the Development during an extreme flood event. It is noted that the village hall at Kingsfold is badly impacted by such flooding.

KBLR supplied photographs of significant flooding that is observed on site. The authors of the Flooding report in appendix 11.1 section 3.1 argue that the pictures are historic and in fact help validate the hydrological model by claiming that the flooding shown is predicted in the model as a one in thirty year event. Residents would argue that the observed flooding occurs routinely every few years. On this basis KBLR believe the model is flawed as it significantly under-predicts such extreme flooding.

Lastly KBLR are concerned that any economic benefits arising from the development may be non-existent or marginal. As mentioned previously since inception in the City Deal region 7000 houses have been built to the onset of the pandemic. In the same period no measurable increase in business rate collection nor private sector net jobs creation has been observed. The City Deal appears to be overspent, underfunded and is in significant and consistent financial deficit which has added to the local tax burden. Local traffic congestion arising from the development construction and occupation, and the associated ill health impacts will add further cost to the local economy with little tangible benefit. Of course the destruction of a high quality recreational amenity and wildlife habitat presents a loss to the community which is immeasurable.