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Application Number: 06/2019/0752

Proposal: Outline planning seeking approval for access only for up to 151no. dwellings with associated works (all other matters reserved)

Site Address: Land at Cardwell Farm, Garstang Road,

Dear Jonathan

I write with regard to your consultation for the above development application and make the following highway and transport comments.

Lancashire County Council as Local Highway Authority (LHA) is responsible for providing and maintaining a safe and reliable highway network. The County Council is also committed to reducing congestion and delay and improving highway links both locally and strategically. With this in mind the present and proposed traffic networks have been considered which are influenced by this proposal.

Summary

The development as submitted cannot be supported, the applicant has not demonstrated a safe and suitable access to the site can be achieved for all people, and sustainable means of transport to support the NPPF. Nor has he developer provided adequate technical basis to show that the cumulative development proposals will not result in severe impacts on the A6 corridor.

Development

The application is outline planning permission for the erection of 151 no. dwellings with all matters reserved except for means of access. The site incorporates the land that has extant permission for 55 dwellings under permit 06/18/0238, thus the application is for an additional 96 dwellings.

Access is proposed from Garstang Road A6 Barton, via a new access junction to the south of the retrained access to Cardwell's Farm.

The submission includes a Proposed Site layout, MCK drawing no. 0003. This plan indicates a pavilion with parking area and 2 sports pitches.

The application is supported by a Transport Assessment (TA) by SCP, Doc Ref: TH/18205/TA/01 dated June 2019. The TA does not mention the extant permission nor the pavilion, parking, or sports pitches.

Site Location/Existing Local Highway Conditions

The site is located to the east of the linear part of Barton village along the A6 corridor. The location is semi-rural and the site is a green-field site currently under agriculture, it appears that current access is through Cardwell Farm.

The local highway network includes the Garstang Road, A6 which provides a primary route to/ from Lancaster and Preston, the strategic motorway network and other corridors in a westerly direction towards the Fylde coast.

Garstang Road at this location is subject to a 40mph speed limit. At the site location Garstang Road has a carriageway width of 10m with a variable width footway and verges. There is class 'A' street lighting. On the site frontage there are no restrictions to parking/waiting on Garstang Road.

The site is not effected by any Public Right of Way.

Site Access

Vehicular access to the site is proposed from Garstang Road by a new priority junction as shown on SCP TA Drawing no. SCP/18205/SK04. It is proposed the site access will have a carriageway width of 6.0 metres and 2 metre footways on both sides, with 9m junction radii. The plan indicates provision of a right turn lane but the plan does not take account of the new junction to the Wainhomes site west of A6. It would appear that the recently constructed pedestrian refuge is within the area indicated for the new right turn lane into the proposed development. Hence the full right turn lane cannot be developed as indicated. The plan does not include pedestrian refuges to aid crossing the busy principle road.

The basic geometry of the access would be acceptable, but as the proposed site access drawing does not include the detail of the recent junction to the Wainhomes site west of A6 and there is doubt that the junction cannot be constructed as indicated.

There is an existing footway and verge on the site frontage and the 2.4m x 120 m visibility splays shown on the access drawing are appropriate to the road/location and theses are achievable over the highway verge/footway.

As submitted the developer has not demonstrated a safe and suitable access to the site can be achieved for all people.

If you are minded to approve this application, please request the developer provide clarification on the relationship of the proposed junction to the recent new junction, and provision of pedestrian refuges on an amended site access drawing.

Background - Latest LCC Review of forecast traffic flow and modelling at M55 Jct.1

The application site is not allocated for development within the current Preston Local Plan. This means that the transport impacts of developing the site have not been assessed alongside the remainder of the Local Plan. Consequently, LCC would expect the developers transport assessment to demonstrate that the cumulative impacts of the proposed development will not have a severe impact on the existing and proposed highway infrastructure, specifically the function of A6 corridor/Broughton Bypass and the M55 Junction 1.

Currently the congestion (queuing and vehicle delay) from the M55 junction often extends onto the mainline of both the M55 and the M6 beyond. On the local network queuing and delay extends over a number of corridors within Preston creating a level of localised severe congestion, at times gridlock. The scale of development planned (Local Plans/committed), which will impact in the A6 corridor and in particular at M55 junction 1, from the adjacent districts of Wyre, Fylde, Ribble Valley and Preston is unprecedented. With this it is not unreasonable that the highway authority has ongoing concerns. Any level of additional traffic at this location, whether from one proposal, or multiple developments (cumulative impacts) is a concern to the county council.

LCC updated its own M55 junction 1 traffic model on 30th Jan 2019. The position following this update was that LCC's own cumulative assessment analysis of the A6 corridor has shown there would be potential future capacity for the cumulative developments (for developments submitted/approved at 30 Jan 2019) with the consideration and the impact on the wider network at critical congestion pinch points such as the M55 Junction 1. However, the junction was at, or close to capacity and there was no indication of spare capacity for additional development over that planned.

For clarity, the county council has identified a number of mitigation measures and modelled the benefits of those which influence M55 junction 1.

The modelling undertaken took into account the revised traffic growth forecasts and the following improvement schemes:

- additional approach lanes as a result of Broughton Bypass (now constructed),
- additional approach lanes to the junction from the M55 slip roads (funding secured from development - not yet delivered),
- the positive benefits at the M55 junction 1, with traffic redistribution as a result of:
 - M55 junction 2 and Preston Western Distributor Road (not yet delivered by LCC under the City Deal)

- Durton Lane Link (secured by development and under construction)

The county council updated modelling also required the use of the latest outputs from the Central Lancashire Transport Model (an area wide strategic model) being updated by consultants Jacobs. These outputs were provided in early January 2019. The CLTM outputs provide critical information on the redistribution effects at M55 junction 1 of proposed infrastructure changes such as Preston Western Distributor and D'urton Lane Link. The latest CLTM outputs indicate greater benefits to the future operation of M55 junction 1 (compared to the previous strategic modelling results) and this is one of a number of factors influencing the latest county council updated modelling of the junction. The updated junction model has been undertaken using standard proprietary software, LinSig.

Since this 30th Jan 2019 update there have been several applications that impact on this junction/corridor and without the inclusion of current applications submitted since 30th Jan 2019 in the LCC model there is no certainty that this and further development can be accommodated and will not contribute to the cumulative impacts on the M55 junction 1.

It is expected that the LCC junction model can be run before the end of this month with the inclusion of the current application. Subject to the outcome of the modelling exercise it may demonstrate that there will be spare capacity at on the A6 at M55 J1, but at present LCC cannot support the principle of this development and its traffic impacts on the A6 corridor.

Accessibility by Sustainable Travel Modes.

Current national policies regarding sustainable travel are contained in the NPPF, and NPPF policy should be applied to this site. The NPPF indicates that new developments should promote more sustainable transport choices for people, particularly accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling to reduce the dependence on the private car. Specifically the NPPF Paragraph 103 states; 'The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'

Public Transport – Bus Services

The site is located close to existing bus stops which is a clear benefit in terms of sustainability. The majority of the site would be within 400m walking distance to the nearest bus stops located on Garstang Road and the site is fortunate there are regular bus services on A6 linking the site to Preston, Garstang, Blackpool and Lancaster. The site has potential for sustainable travel, subject to connectivity to bus stops via safe pedestrian routes.

However, the local bus stops are not full mobility standard with shelters and there is a lack of crossing facility to the nearest north bound bus stop, the developer should consider site accessibility.

Accessibility on Foot

The TA states there are many local facilities close to the site including several schools, but also notes that there are "retail, leisure and educational facilities further afield". This is where the site falls short in terms of the local environment accessibility, in that a range of services are "further afield" and not within the village, or convenient walk of the site.

Conversely to the TA description, the Appendix 5 for the 2km pedestrian catchment area from the site illustrates this point that the catchment excludes secondary schools and employment areas. With limited employment opportunities, no secondary education, no food retail, or health facilities available, this will result in little, or no model shift to walking.

The TA indicates that there are continuous footways on both sides of Garstang Road which provides safe and convenient routes for pedestrians to access the village centres of Barton and Broughton. However, this is not a correct statement regarding both sides of Garstang Road. The developer should clarify this and in the absence of these assumed facilities provide measures to secure these facilities.

LCC consider that in terms of walking to nearby villages and towns the local area is not particularly well served. On the A6 there are sections where footway provision is poor, in particular the walking route to secondary schools in Broughton and Garstang and walking to these schools is not an attractive modes of travel.

Accessibility by Bicycle

The TA acknowledges that cycle journeys up to 5km have the potential to replace car journeys and the plans at Appendix 5 shows a 5km catchment area around the site. It can clearly be seen from these plans that the 5km cycle fails to reach Preston city centre and major employment areas. As a smoke screen for this failing, the TA states the plans also demonstrate that connections to regional and national cycle network (NCN) routes. But again the plans indicate the site is remote to these routes and these routes do not provide safe convenient routes to employment and education centres.

LCC consider that in terms of cycling to Preston City or north to the town of Garstang the local area is not particularly well served. Advisory cycle lanes on the A6 are intermittent and don't provide a continuous route to secondary school/employment destinations, particular the cycle routes to secondary schools in Broughton and Garstang for vulnerable children. Given the traffic levels on the A6 cycling to these schools is not an attractive mode of travel.

To its benefit the TA acknowledges there are not continuous cycle lanes along the A6, but does not identify any improvement/extension of the cycle lanes as a way of encouraging more sustainable forms of transport.

Summary Accessibility by Sustainable Travel Modes.

While the TA considers the existing accessibility of the site on foot, by cycle and public transport, the applicant fails to demonstrate how the proposal can be made sustainable, specifically consider "opportunities to maximise sustainable transport solutions", to make the fullest possible use of public transport, walking and cycling and to ensure those opportunities for sustainable transport modes have been taken up by the developer. Hence the development is not in line with a number of key paragraphs of the NPPF including the three dimensions of sustainable development.

The applicant needs to take measures to make walking/cycling a realistic choice for residents of the development, and reduce the need to travel by car.

Layout /Parking Provision

The developer has provided an indicative internal layout for the development shown in drawing 0003. However, the planning application is for outline with access only applied for at this stage, with internal layout subject to the reserved matters application.

The proposed internal street network seems to be based the spine street having a width of 5.5m and a 2m footway, this would be acceptable in principle. However, within the site footways are shown not continuous with the carriageway. These may not be suitable for adoption and where footways stop/start the layout will need careful consideration regarding traffic management.

Given the scale of the development it is recommended that the highway should be adopted and constructed to Lancashire County Council's adoptable standard. If the internal road layout is to be adopted it should be designed in accordance with current design guidance and in agreement with LCC.

The following comments are advisory at this stage in regard to the internal site layout. It is expected that the any elements of the site beyond the site access junction with Garstang Road (which would fall under s278 works) will be considered for highway adoption under a section 38 agreement with Lancashire County Council.

The developer is advised to consider these comments at the further detailed design of site proposals. Where the recommendations below are not considered at the early planning stages this may lead to abortive design work, delays and necessary changes if future layouts submitted do not satisfy LCC requirements in regard to layout and safe provision for vehicular and sustainable transport. It is important that the highway authority, is satisfied on all matters including internal road widths, foot/cycle way widths/ locations, suitable service verges, turning heads size, car parking and servicing that satisfies safety for all users (including mobility impaired), suitability for

service vehicles to manoeuvre around the development and visibility within highway boundary.

In particular, I would ask the developer to note the following:

- a) An adequate number of parking spaces (car and cycle) must be provided for the proposed residential development, in line with agreed Preston City Council standards. Failure to provide adequate parking can result in excessive parking on street, parking on footways and verges with resulting safety, amenity and maintenance issues.
- b) All turning heads to be to LCC adoptable standards, or proven by swept path;
- c) I would expect the development to provide electric vehicle charging infrastructure at appropriate locations.

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

The applicant is advised that highway surface water drainage system must not be used for the storage of any flood waters from the adoptable United Utility surface water system, or any private surface water drainage system. In general, LCC will seek to limit the use of culverts where alternative sustainable solutions can be found.

The submission of engineering and constructional details together with the extent of adoption should be agreed in principle by the developer and Highway Authority at the reserved matters planning stage.

Highways Impact of Development Traffic

As stated above the site is not allocated for development within the current Preston Local Plan. This means that the transport impacts of developing this site have not been assessed alongside the remainder of the Local Plan.

The TA does not include any traffic assessment / consideration of the M55 J1. Whilst the level of new trips generated by the development will have minimal impact on the adjacent local highway network there is a concern that even a relatively low number of new trip movements could have greater impacts further afield such as on the A6 between the site and Preston including the M55 junction 1 (as identified above under Background).

Consequently, the developers has not demonstrated that the cumulative impacts of the proposed development will not have a severe impact on the existing and proposed highway infrastructure, specifically the function of M55 Junction1.

Thus at present LCC cannot support the principle of this development until there is a junction analysis to establish if there is capacity to satisfy the developments traffic impacts on M55 Junction1.

Travel Plan

In accord with NPPF I would expect a travel plan for the scale of development proposed.

A Full Travel Plan and its implementation would be appropriate for this level of development proposal in due course when the site is occupied. The developer may wish to consider a village wide travel plan to include their other developments locally

In addition, if approval was to be given for this application, LCC would expect a commitment from the developer to ensure appropriate funding is available to support measures and targets within an agreed Travel Plan. This commitment should be included in any agreed s106. This funding should be made available to the developers appointed travel plan coordinator and not passed to the LPA or the LHA.

Note: the funding must have the potential to deliver a real change to more sustainable modes. Such a change could be delivered through funding towards a bike (and safety equipment) for each household and a month's travel on public transport to encourage modal shift. The level offered must be adequate to deliver the measures necessary to support the targets within the Travel Plan and to be retained by the developers appointed travel plan coordinator (and not LCC or the LPA) for 5 years after completion of the development.

For an outline planning application I would only require a simple Travel Plan Framework/Action plan which identifies funding streams for the Travel Plan delivery.

For development of this scale Lancashire County Council (LCC) highways can provide a facility to the developer to enable the highway authority to provide a range of Travel Plan services as outlined below.

- *Appraise initial Travel Plan(s) submitted to the Planning Authority and provide constructive feedback.*
- *Oversee the progression from the Interim Travel Plan to the Full Travel Plan/s in line with agreed timescales.*
- *Monitor and support the development, implementation and review of the Full Travel Plan.*

This will include reviewing:

- *Annual surveys*
- *Progression of initiatives / actions plan*
- *Targets"*

An application of the scale proposed would incur a cost of £6,000. Please note: This is an LCC service offer to the developer and not a requirement. I would hope that your Council and the developer support this service.

Summary

Lancashire County Council takes its responsibility seriously with respect to the current and future use of the highway network. With consideration for all the information provided by the applicant to date, Lancashire County Council consider that there are adverse highway and transport impacts associated with this development, as currently submitted.

It is acknowledged that the developer would be expected to support a level of wider strategic infrastructure in Preston via CIL contributions. Notwithstanding CIL, currently the development as it stands is unacceptable both in terms of the proposed vehicular and pedestrian access, sustainable transport provision and traffic impacts strategically.

Specifically with regards to the traffic impact of the development the applicant has failed to demonstrate that the development will not have an unacceptable cumulative impact on highway capacity in the Broughton M55/J1 area. It is critical that development related increases in movement (demand) are suitably considered and appropriately mitigated against.

TA has not demonstrated the site can provide measures to encourage sustainable public transport. There is also a lack of information, support and commitment with regard to satisfying the sustainability needs of this site. There are inadequacies in sustainable transport provision for pedestrians and cyclists to satisfy the NPPF foundation of providing for sustainable transport. Further evidence and support is also required with regard to pedestrian/ cycle connectivity to the wider built environment.

As submitted, changes are required to the access provision to ensure that a safe vehicular access to A6 can be provided, and linkage to north bound bus services.

Currently, LCC do not support this development proposal for the following reasons:

- The development fails to provide for safe and adequate means of both pedestrian and vehicle access. Further evidence is required with regard to the design and operation of the site access proposed on Garstang Road.
- There is a lack of information, support and commitment with regard to satisfying the sustainability needs of this site. There are inadequacies in sustainable transport provision for pedestrians and pedestrian linkage to local facilities, and access to public transport to satisfy the NPPF foundation of providing for sustainable transport.
- The application submitted, currently fails to demonstrate network capacity strategically to support the impacts of this proposal. The application has not provided analysis for the wider highway network and there is no adequate technical basis to show that the cumulative development proposals will not result in severe impacts on the A6 corridor.
- The lack of travel planning to accord with NPPF requirements

Note: The applicant may wish to submit revised plans, details, evidence and commitment that, if acceptable, may overcome the concerns.

I hope the above is of assistance in your Councils determination of the application, if you have any questions please feel free to contact me.

If contrary to my recommendations you are minded to approve this application, I would be pleased to provide suitable planning conditions.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'David Allen', with a horizontal line underneath.

David Allen
Highways Development Support
Community Services