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**Application Number: 06/2018/0884**

**Proposal: Outline planning application for up to 140no. dwellings with all matters reserved except for access**

**Site Address: Bushells Farm, Mill Lane, Preston, PR3 2BJ**

Dear Ben

I write with regard to your consultation letter dated 21 August 2018 and make the following comments on the above application.

### **Development**

The application is for planning permission for residential development comprising up to 140 dwellings with all matters reserved except for means of access. The application states that of the proposed 140 dwellings, approximately 45% will be affordable types for first time buyers who live in Goosnargh, or who have previously lived in the village. The application also proposes a community car park for approximately 40 parking spaces.

Access is proposed directly from Mill Lane, with a secondary entrance for 'access only' from Church Lane. The application submission includes an indicative layout, drawing no. WD18-12 –MP01 - Masterplan. The application is supported by a Transport Assessment (TA) by VTC, dated 1 August 2018.

### **Site Location/Existing Local Highway Conditions**

The site is located to the south of Mill Lane on the eastern boundary of Goosnargh village. The site is bounded by Church Lane to the west and to the south by existing residential properties fronting Whittingham Lane. The site is a green-field site currently under agriculture.

Mill Lane C357 is a secondary distributor road, which is the continuation of Church Lane (C357) which connects to the south with Whittingham Lane. Whittingham Lane, B5269 is a secondary distributor road running east-west from Longridge through the villages of Goosnargh and Whittingham to the A6 at Broughton. The site is located around 4km east of Broughton Bypass.

**Phil Barrett**

Director of Community Services

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At the location of the proposed site access Mill Lane is approximately 5.0m in width. The road is subject to a 20mph speed limit to the west of the access point and national speed limit of 60 mph to the east of the proposed access point. Mill Lane is lit by a system of street lighting, there are centre line (hazard) road marking along the site frontage. There are no footways on Mill lane at this location. There are no commercial bus services operating along Mill Lane past the site.

The site is also effected by Public Right of Way (PROW) footpath no.19 which runs north/south through the site.

### **Background - Proposals (development/ infrastructure) that influence the A6 corridor**

The application 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 considered 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 (together with committed and planned 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.

This development is located north east of Preston and is reliant on the A6 corridor which forms the main route between the site and Preston/Fylde and Wyre districts and the strategic motorway network M6/M55. In previous correspondence, LCC have indicated grave concerns, given the number, scale and location of recent developments in the Broughton/ Barton/ Goosnargh/ Garstang/ Catterall areas as the highway network beyond the immediate site environs does suffer from a level of congestion, with queuing occurring during peak times at the M55 Junction1, and on other corridors. In the future, significant highway infrastructure is to be provided in Preston district having some influence on the A6 corridor, but it is anticipated that the committed infrastructure will only satisfy planned sites including those in the NW Preston allocation (who will be funding the CIL list) as well as other previously supported sites (within Preston/Wyre/Ribble Valley) that fund additional measures through s106 contributions (for infrastructure not part of the CIL list).

As stated the local highway network includes the 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, in particular the A586. It is critical, therefore, that the impact of this development does not compromise reliability and safety in the movement of people and goods by any mode on any part of the network.

The County Council is committed to reducing congestion and delay while supporting economic growth throughout Lancashire, including supporting private sector led economic growth, the creation of jobs and access to employment, education and training. This approach requires making the maximum use of the existing capacity within the transport network and where appropriate identifying necessary improvements to infrastructure to facilitate development. To do this, LCC must evaluate the operation of both the local and wider network for all transport modes with regard to any changes proposed as part of the planning process for new development (working closely with Highways England, where appropriate and other councils that fund change to the highway network i.e. through their CIL list/City Deal).

Recent major planning applications at Barton and in Wyre and Ribble Valley districts led to the development of a strategy for the A6 corridor/M55J1 which would allow those developments to forward. The developers for these sites bought into LCC's strategy that maximised capacity on the A6 corridor in particular at M55 J1 that enabled their developments to come forward and agreement on highway matters was reached.

The strategy developed by LCC maximises the quantum of development that can be supported, however, would not allow endless levels of development to come forward as it can only deliver limited highway capacity improvements. And it is anticipated that the road network (with all major infrastructure delivered as per City Deal and developer funded mitigation agreed at M55 J1) will be operating at/ beyond its theoretical capacity when all committed/ planned/ expected development is included in the future, (including highway mitigation).

LCC's own cumulative assessment analysis of the A6 corridor undertaken in December 2017 which includes consideration and the impact on the wider network at critical congestion pinch points such as the M55 Junction 1, has shown that there severe impacts and that the effected highway network considered is unable to satisfy the demands required of it. The analysis has also identified capacity issues at other junctions on the A6 (in addition to sustainable transport infrastructure requirements).

Thus there is significant concern strategically and there becomes a point where the assessed highway network cannot support further impacts without severe detriment, and in some cases this can be the addition of only small amounts of traffic. From a consistency perspective the points raised in the above paragraphs have been highlighted to the district councils and a number of developers all wishing to come forward with similar scale, or larger developments. Unless there are changes that impact on background traffic levels this position will remain by the county council.

LCC are currently reviewing the previous junction model for the M55J1, including the collection of new traffic data, and will consider the influence of all committed development in Preston and other influencing development including that from Wyre and Ribble Valley, Preston City Councils Local Plan (supported by LCC) and the Preston Western Distributor (with associated infrastructure) to see if the model identifies capacity that provides opportunities for any further development. Note, this modelling exercise includes the future benefits resulting from all NW Preston Masterplan highway infrastructure in addition to the Broughton Bypass. (However, at present LCC are unable to gather further traffic count data during the summer months and the completion of the modelling exercise is unlikely to be completed until late October 2018).

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.

### **Site Access - Vehicles**

Vehicular access to the site is proposed from Mill Lane by a new priority junction. The proposed development access is shown on TA Appendix 5, Drawing No. 886.jcc. It is proposed the site access will have a carriageway width of 5.5 metres, with 6 metre junction radii onto Mill Lane, and a 3 metre wide shared footway / cycleway along the west side of the access road into the development.

The proposed highway access has the required visibility splays for the measured 85th percentile traffic speeds, as recommended in Table 7.1 of the Manual for Streets.

The proposed junction geometry is acceptable subject to satisfying the vision splays and any additional street lighting as identifies at construction detail design stage.

A secondary vehicular access point is proposed from Church Lane. The applicant proposed this access to be for entry only 'to allow access into the development and the proposed community car park that will be provided within the site.'

The principle of the proposed Church Lane access is acceptable, again subject to detail design which must include a legal means to control the entrance point to ingress only.

### **Access on Foot**

The site framework indicates pedestrian cycle links to surrounding roads. The vehicular access from Mill Lane includes a 3 metre wide shared footway/ cycleway into the development. The vehicular entry from Church Lane includes a 2m footway into the site. There is a further pedestrian route to Church Lane (adjacent to no. 4), close to the junction with Whittingham Lane, but the TA does not include any detail of this route. Subject to details the proposed internal footways connecting west/North to Church Lane/ Mill Lane have the potential to provide adequate pedestrian routes to the village centre and local facilities.

It is also proposed to provide a pedestrian link south to Whittingham Lane via the public right of way (PROW) Fp19. The existing PROW is not an attractive route for residents to get to bus services or local facilities, it is narrow, unlit and unsurfaced and not a safe and accessible route at all times of the day/year. Hence the existing PROW will require surfacing and lighting. I would expect the PROW to be improved to suitable standard to support use by pedestrians throughout the day and year.

I request that the developer provide details of the pedestrian route to Church Lane (adjacent to no. 4), and the potential PROW upgrade to Whittingham Lane.

### **Access by Cycle**

The TA is brief regarding accessibility by cycle. The only statement being that the '*development will be located within a reasonable, 5 kilometre, cycling distance of Longridge.....This will allow some residents, to cycle between the proposed development and the residential areas, shops and services in Longridge.*' While the cycle distance is not great the route along Whittingham Lane to Longridge is not an attractive route for employment or education trips. This road is subject to 40mph speed limit with fast moving traffic (of all vehicle types), the road has no street lighting for most of the journey and there is no footway for children, or less experienced cyclists.

### **Public Transport – Bus Services**

There are several bus stops located to the west of the site on Church Lane and south on Whittingham Lane, within an approximate walking distance of 400 metres from the centre of the site, when using the proposed access points and PROW.

The TA at para 7.2 states; *'There is a regular bus service that operates along Goosnargh Lane, Church Lane and Whittingham Lane between Preston – Royal Preston Hospital – Broughton – Goosnargh - Longridge, in both directions. This bus service operates approximately hourly on Monday – Saturday'*. While the service operates 'approximately' hourly it is a lengthy slow journey to get to Preston with inconvenient timings for daily commuting.

Currently there is only one bus service at Goosnargh, the Stagecoach service No.4 with a limited level of service. To get to destinations in Preston city centre before 9am passengers need to catch the bus at 7:31am (arriving in Preston at 8:29am with a 58minute journey time). The following bus leaves Goosnargh at 8:43 arriving in Preston at 9:36. The PM peak return trips are at 15:50pm (arrive Goosnargh at 16:41pm) and the last return bus of the day. Leaving Preston bus station at 17:05pm

These service times and journey times do not make the bus service a realistic choice for office or shop workers in Preston, and workers outside the city centre that would need on-travel extending journey times /working days further. In the circumstances I would assess the site as being far from accessible and therefore not compliant with NPPF

While the site is located close to existing bus stops which is a potential benefit, the existing bus service is unlikely to provide a realistic travel choice to encourage trips by sustainable modes of transport. There is also further concern that with planned development within Preston and Ribble Valley that there will not be adequate capacity on the existing bus service to accommodate additional passengers from development at this location. Has the developer carried out any check on the service capacity for the peak time buses.

As submitted the developer has failed to demonstrate that the site situation and the existing bus service will encourage trips by sustainable modes of transport.

It is recommended that the developer provide details of the available capacity on existing and planned bus service that serve the site, and more importantly how services can be improved to provide an increased level of service (ie additional services at peak times) and reduced journey times into the city centre.

### **Accessibility by Sustainable Travel Modes - Summary**

While the proposed development site can be classed as within walking distance of a range of local facilities, the site is located within an existing rural area with a limited range of local employment, wider services and facilities, and residents will be dependent on the private car to access a full range of facilities. I cannot agree with the Planning Statement/ TA that the site is *'well served'* by a regular and frequent bus service as the existing bus service is not a practical option for commuters to Preston.

It is worth noting that the Planning Statement highlights that the site is *'well located in relation to the strategic highway network with good access which can be further improved'*, this would imply that the applicant has chosen the development site with respect to car travel and has considered highway network improvements to encourage car use when they should encourage/ promote more sustainable transport choices for people to reduce the dependence on the private car.

I consider that for this rural location there are **not realistic sustainable transport choices** for residents to employment or wider services, and therefore, cannot agree that the proposed development complies with the requirement of the National Planning Policy Framework (NPPF), that new developments should be accessible by sustainable transport.

### **Community Car Park**

The proposed community car park will have approximately 40 parking spaces. The TA indicates that the car park will *'reduce on-street parking along Church Lane including at school start and finish times by providing a safe parking area for parents to park. The community car park will also be available for people who are visiting events at the Village Hall. The proposed entry route will also reduce the existing volume of traffic that uses Church Lane at school start and finish times and reduce the traffic congestion near the primary school by allowing drivers to access the proposed car park, or the primary school, without travelling north along Church Lane (beyond the proposed access).'*'

The principle of the proposed car park and access strategy is acceptable. But, as stated above under access, the detail design of the entry only access point must include a legal means to control the entrance point to ingress only.

### **Highways Impact - Traffic Analysis**

The TA includes trip generation rates for both private dwellings and affordable dwellings, these vehicle trip rates used are taken from the TRICS data base. While the use of this data base is acceptable practice, the TRICS sites use by VTC to generate trip rates (for both private and affordable dwellings) includes suburban area, edge of town and neighbourhood centre locations that are not typical of this rural location. The trip rates used in the TA therefore seem low given the proposed village location with low availability of local employment, services and secondary education, together with a limited bus service.

There appears to be very limited relevant data on the TRICS data base suitable for this rural location and my recommendation for private dwelling trip rates would be to use the new development on Henry Littler Way as the basis for trip generation. The developer can gather data for all modes.

For affordable dwellings the Community Gateway Association should be able to suggest suitable location to gather trip rates. But there is always the question as to what constitutes affordable housing. The developer has stated that the development is to provide affordable accommodation for first time buyers who live in Goosnargh, or who have previously lived in the village. Does this therefore exclude Whittingham residents? Will the affordable units be truly affordable (ie for low affordable rent for those unable to secure a mortgage), or will they only be provided on discount/shared ownership criteria. And importantly what happens when there are insufficient potential occupants who meet the strict qualification criteria (as proposed by the developer), will the dwellings be released to the open market.

I would be pleased if the planning authority would provide their evaluation of the "affordability" of the proposed dwellings so that LCC can make a reasoned evaluation of the likely development traffic impacts.

The TA does not include any traffic assessment either locally, or the wider highway network. There is no consideration of the wider network especially 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).

When the cumulative effects of ALL planned and approved development is taken into account LCC's own analysis has shown that there is a significant concern strategically (with severe impacts) and that the effected highway network (as considered) is unable to satisfy the demands required of it. Thus at present LCC cannot support the principle of this development and its traffic impacts on the A6 corridor. As stated above the previous traffic analysis is in the process of being updated, and depending on the outcomes LCC may be able to support some further development that impacts on the M55J1.

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. 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.

### **Internal Layout**

The developer has provided an indicative internal layout for the development. 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 internal road network should be designed to accommodate movement of all vehicles expected to service the development including refuse vehicles. If the internal road layout is to be adopted (as I would expect with this scale of residential development) it should be designed in accordance with current design guidance and in agreement with LCC. LCC would be happy to enter into pre- app discussions on the internal layout should the outline application be approved.

### **Public Right of Way (PROW)**

Public right of way, Fp19 runs within the eastern boundary of the site. The Planning statement indicates that the footpath route is not obstructed but the proposed indicative layout will require the route to be diverted. The grant of planning permission does not entitle a developer to obstruct a right of way and any proposed stopping-up or diversion of a right of way should be the subject of an Order under the appropriate Act.

### **Summary**

Lancashire County Council takes its responsibility seriously with respect to the current and future use of the highway network. In reaching our position with regard to this development proposal, LCC have conducted a review of the submitted information presented. 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.

The development as submitted is unacceptable in terms of providing adequate means of pedestrian access and with regard to the sustainable transport provision, it is critical that development related increases in all modes of movement (demand) are suitably considered and appropriately mitigated against.

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

- The development fails to provide for safe and adequate means for pedestrian access. Further detail is required with regard to the design and operation of the pedestrian site access proposed to Church Lane (adjacent to no. 4), and the PROW upgrade to Whittingham Lane.
- 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 that the network can strategically support the impacts of this proposal (operationally in terms of capacity and safety). The applicant 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.

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



David Allen  
Highways Development Support  
Community Services