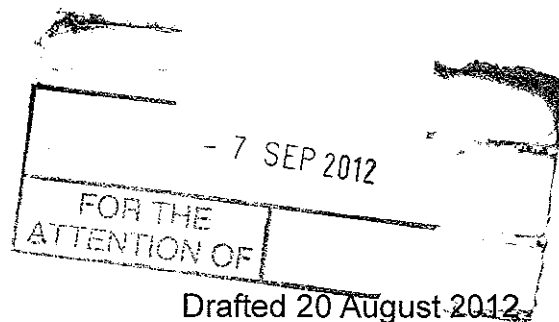


Director of Development Services
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Council Offices
Church Walk
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Martin Nugent
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D3/12/0687



Dear Sir

**Outline Planning Application, Ribble Valley District
D3-12-0327 land to the east of Clitheroe Road (Lawsonsteads), Whalley**

I refer to your letter of 13 August 2012 concerning the above application.

This application is a direct resubmission of 3/2012/0327 and there have been no subsequent alterations, amendments or improvements made in the immediate local highway infrastructure or significant changes in previously observed traffic patterns.

My comments refer to an Outline Planning Application with all matters reserved for future determination. This Application is for a development of up to 55 residential dwellings and a 50 bed nursing home within a site accessed directly from Clitheroe Road, Whalley.

The following comments relate to the Transport Assessment (dated March 2012) prepared by Bryan G Hall, Consulting Civil & Transportation Planning Engineers and the Design and Access Statement (April 2012) prepared on behalf of the Commercial Estates Group. Lancashire County Council is responsible for providing and maintaining a safe and reliable highway network. With this in mind the present and proposed traffic systems have been considered in and around the area of the proposed development.

I have the following comments regarding the proposed development and the consequent high safety and capacity impacts

I have no objection in principle to this application on highway safety grounds. However, as all matters are reserved at this time, I will comment more fully on the specific highway implications and impacts as and when appropriate.

However, it may be prudent to comment on three details of the illustrative master plan at this time.

1. There are a small number of properties shown fronting directly onto Clitheroe Road. While this may be in keeping with the frontage development further to the east, there are driveways shown that would encourage turning movements and potential on street parking close to the site of the proposed access road

I would wish to see vehicular access to the development limited to a single point, with turning movements focused at a junction designed and constructed to the appropriate specifications.

2. The level of parking indicated at the nursing home appears to be excessive. For a 50 bed nursing home, I would be anticipating no more than 10 car parking spaces

3. The illustrative master plan and the Design and Access Statement (Figure 40) indicate that a separate 1.2m pedestrian route will be established through the site, heading broadly northwards from the proposed junction with Clitheroe Road. This may be considered in addition to, but not as an alternative to, the provision of appropriate footway links to and within the site.

The "Heads of Terms" document identifies potential items for inclusion in a Draft S106 agreement, with Section 8 referring to "TRO Contributions". I have not requested and will not be seeking to pursue any TRO Contributions in relation to this outline application. Any reference to such items in the "Heads of Terms" is therefore inappropriate at this time.

Similarly, in the Transport Assessment, under "Section 7; The Proposed Development", reference is made to various highway measures, with specific items highlighted for consideration. At this time and in relation to the outline application, I have made no demands for highway measures.

These comments are made with regard to the transport report prepared by Capita Symonds, following a commission from Save Whalley Village Action Group, a copy of which I received on 19 April 2012.

Given the nature of the current application being considered; an outline application with all matters reserved for future determination, it is not appropriate or necessary to introduce a specific reference to the Capita Symonds report at this time.

I will provide comprehensive comments on the specific highway implications and impacts of this proposal, as and when appropriate. For example, a series of detailed and specific transport assessments were considered in relation to a previous application at this site, D3/2011/0111.

It is the statutory role of the Highway Authority to consider the highways impacts of a proposed development and their longer-term sustainability in relation to the local highway network. In this instance, the proposed use of this site and the scale of development do not recommend, or provide an opportunity for, further detailed comments at this time.

Although PPG13 has now been replaced by the National Planning Policy Framework (NPPF), this current document still states that -

'All developments which generate significant amounts of movement should be required to provide a Travel Plan... Until any new local standards or criteria are determined and agreed it would be sensible to refer to the previous thresholds'.

The Residential Institution element of this mixed use development is on the limit of the DfT guidelines at which a Travel Plan is required. Although the dwelling houses component is below the limit, it should be included otherwise it is a missed opportunity.

Application 3/2012/0687 has included a Framework Travel Plan as part of their application for Outline Planning Permission. The standard components of a Framework or Outline travel plan are :

- * A time-frame for the development of the Full Travel Plan. (including dates for the appointment of a coordinator, residents survey and submission of the full travel plan to the planning authority). This plan makes no mention of the development of a Full Travel Plan, which should be submitted to the Local Authority within 6 months of the 1st travel survey.

- * Details of cycling, pedestrian and public transport links to and within the site - are included

- * Details of the provision of secure, covered cycle parking for those properties/units where suitable space is not available - is not included.
- * Outline Objectives - are included
- * Outline Targets - are included
- * List of proposed measures to be introduced - is included
- * Details of arrangements for monitoring and review of the Travel Plan for a period of at least 5 years - are included

In general, this Framework Travel Plan is good, but concentrates on the residential element and gives little focus to the Care Home aspects of the proposed development. It is good that the role of the Site Travel Plan Co-ordinator (STPC) is described in quite a lot of detail, and that this person will take overall responsibility for travel planning for the whole development. It would also be good however to see some detail as to how the other Travel Plan co-ordinators will be appointed.

We would request that the production of a Full Travel Plan for each individual element (or a combined plan) be made a condition of planning approval. The Travel plan(s) should include an element of co-ordination between the various elements and should adhere to the following timescales and content -

- * Travel Plan Co-ordinator appointed and LCC's Travel Plan Advisers informed of contact details at least 1 month prior to 1st occupation of the proposed development.
- * Travel survey(s) undertaken within 3 months of occupation of the proposed development (for residential element - within 3 months of reaching 50% occupation)
- * The Full Travel Plan submitted to the Planning authority within 6 months of the first travel survey

In addition to the elements already outlined above for the Framework Travel Plan (which should be developed to provide further detail), the Full Travel Plan should also include the following as a minimum -

- * Details of the appointed Travel Plan Co-ordinator(s)
- * Details of resident's and employee travel surveys
- * SMART Targets for non-car modes of travel
- * Action plan of measures to be introduced and appropriate funding

A contribution of £6,000 would be requested to enable Lancashire County Council Travel Planning team to provide a range of services as described in 2.1.5.16 of the Planning Obligations in Lancashire paper (dated September 2008). This could include -

- * Provision of leaflets and maps for the Welcome packs
- * Design travel survey and analyse results
- * Advice and Guidance on Travel Plan development
- * Support meetings
- * Access to Lancashire's Car sharing website
- * Monitoring the development of the Plan

Martin Nugent

Public Realm, Ribble Valley
LCC Environmental Services East