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Your ref: 3/2012/0942
Our ref:
Date: 22nd October 2013

Dear Sarah,

PROPOSED RESIDENTIAL DEVELOPMENT AT STANDEN ESTATE, CLITHEROE

APPLICATION: 3/2012/0942

**PROPOSAL: APPLICATION FOR THE DEVELOPMENT OF A 50.1HA SITE FOR MIXED
USES AT STANDEN ESTATE, CLITHEROE**

The following comments relate to the Transport Assessment (October 2012) prepared by Savell Bird & Axon (SBA) on behalf of the Trustees of Standen Estate (TSE), and the associated additional information that has been submitted during the assessment period by SBA to Lancashire County Council (LCC) as Local Highway Authority (LHA).

The application is for a mixed use development, comprising of 1,040 residential dwellings, 0.5ha for local retail, service and community facilities, 2.25ha employment uses, and 2.1ha primary school site with public open space. The masterplan for the site indicates only one access for all modes which is onto the C553 Pendle Road.

It is noted that access to the site has been included as a reserved matter for this application. Considering this, LCC need to be consulted with all subsequent applications that are associated with this site, and agreement must be reached with LCC prior to the commencement of any works (including construction traffic) associated with development on this site should this application be approved by RVBC. While I would concur that consultation and communication between LCC and SBA has been undertaken during this time, this application does not include definitive

access proposals. Details of all accesses for this proposed development will be required by LCC so that accurate transport impacts can be determined and that proposals are appropriately mitigated to LCC satisfaction.

LCC has concerns regarding the scale of development and its impacts with a single access point off the Pendle Road which is rural/semi rural in its environment. The additional vehicles generated by this proposed development will result in higher flows on the surrounding network, particularly along one corridor which is a predominantly rural link. It is also noted that this residential development is beyond the existing built environment and as such will require a number of changes to support the integration of the site with the existing built environment and wider community for all modes and purposes. If all supporting changes/measures are not delivered the proposed residential area may become a car dependant community with car usage higher than that assessed and that of the surrounding built environment which will negatively impact on the operation of the highway network.

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.

Site Location and Existing Highway Network

The development site is located to the south of Clitheroe, predominantly within the ward of Littlemoor. The site is bounded by the existing built up environment to the north, where there is a network of residential access roads. To the east the site is bounded by the predominantly rural C553 Pendle Road, extending to the west toward the A671 Whalley Road. Pendleton Brook valley, woodland, farmland and the A59 are to the south.

Access Strategy

The developer has indicated that a single primary access onto Pendle Road into the development would be a roundabout junction. Additionally, the developer has indicated that there would be an access designated for public transport, emergency vehicles, pedestrians and cyclist use only onto Littlemoor.

LCC has serious concerns with this access strategy. The issue regarding the provision of a secondary access for all modes into this strategic site as requested by LCC has not been resolved and remains outstanding. Access to the site from two highway corridors would offer better dispersion of traffic onto the highway network, allowing greater connectivity of the proposed development with the existing urban area, and allowing a more direct access into the site from areas such as Barrow and Primrose to the new attractions such as the employment area, school and shops, as well as providing improved access (to that proposed) for public transport onto the corridor without constraint. LCC has requested that accesses are provided from the proposed development to the routes of C553 Pendle Road and A671 Whalley Road to the east and west respectively in line with the area of development. This strategy would reduce impact including distance travelled for some car related development trips as access is provided via an alternative corridor which, for some, will be more direct. It is noted

that the illustrative masterplan would include a drive distance of approximately 1.6km from the western side of the site to the Pendle Road access/egress.

The planning application refers to an access into the employment area to the south of the site from Worston Old Road. In order to consider an access at this location LCC would require an assessment of the impacts at the A59/Main Street staggered junction. This assessment has not been provided, however LCC have been informed by SBA that the application for vehicular access at this location does not form part of the application.

LCC provided comments to Ribble Valley Borough Council (RVBC) as part of the consultation process for the Core Strategy. Below is an extract from the Core Strategy 2008-2028 A Local Plan for Ribble Valley Regulation 19 Consultation Draft; *'Work undertaken on infrastructure planning as part of the Core Strategy process has shown that in principle, there are no significant barriers to the development and that the site is deliverable within the plan period. It is envisaged that the site will be accessed by a minimum of two access points from the existing local highway network with a through route for public transport. The development will also necessitate improvements to the strategic highway network at the A59/Clitheroe Road/Pendle Road Junction. Any development should take account of the presence of the line of the Roman Road that runs through the site, which is of archaeological and historic significance. There will be a need for high quality landscaping to contribute a good quality development and address the landscape impacts of a development of this scale.'*

The provision of only one access to a development site of this size remains a serious concern to LCC.

Cycling and Pedestrian Access

This residential development is located beyond the existing built environment and as such requires significant consideration of appropriate measures to suitably integrate the site with the built environment and wider community. If appropriate measures are not delivered, the proposed residential area will become an isolated, car dependant community.

The TA appendices include a proposed Masterplan and parameters plan. This indicates pedestrians and cyclist access from the site to a number of locations;

- Littlemoor Road
- Lingfield Avenue
- Shays Drive
- Worston Road
- Pendle Road

Treatments, such as footway improvements and the construction of pedestrian and cyclist highway crossing points, need to be identified and agreed as the development details are progressed and access is applied for through the planning process.

Further consultation with LCC must be made to review the proposed internal cycle and pedestrian routes within the development. These routes must be attractive to end users, with direct routes to the wider highway network, allowing access to shops, employment, education, leisure and recreational facilities. The internal layout of the site must be designed to maximise pedestrian and cycle permeability with a network of footways and cycleways to link the site to the surrounding local highways and existing pedestrian and cycle network. The following cycling and pedestrian provision should be included in the final site layout;

- direct and continuous cycle links to areas such as Barrow, Primrose and Clitheroe.
- a cycle path along the main distributor road through the development linking Littlemoor to Pendle Way,
- footpaths and cycleways along key routes should be lit where appropriate and agreed, such as to the primary school and district centre, and Lingfield Avenue

Please note that these are initial comments and further review of the final layout may identify further measures.

Table 4.2 of the SBA TA includes traffic generation discounts for internalisation. In order to realise any reduction in TRICS trip rates, the mixed use elements of this strategic site, such as the employment sites and school, must be constructed early in the development.

Accessibility

An accessibility questionnaire was not completed for this application as SBA consider it is not required as the development application is outline with all matters reserved. As access to the site is a reserved matter at this stage, LCC will require much greater detail with regard to the accessibility and sustainability of the site for all modes and the provision of sustainable transport measures when access is applied for. The considerable size of this site means that the walk distances to amenities (existing and that proposed) could exceed desirable distances, depending on the location of the attractions within and beyond the site, for a number of dwellings. The construction of only one primary access for all modes may mean that residential dwellings at the western perimeter of the site have considerably further distances to travel (by all modes) to access all of the site amenities than those located adjacent to the proposed access onto Pendle Road.

The Design and Access Statement (Oct 2012) indicates that 'a range of services can be accessed' approximately 1600m from the site. This distance appears to be from the Pendle Road site access, and the actual distance that residents in the western section of the site would actually have to travel to access the closest GP would be far in excess of this distance, somewhere in the region of 2300m to the centre of the site, and 3000m from the western perimeter if the same route were taken. These distances exceed the desirable walking distances as described in the CIHT document 'Providing for Journeys on Foot'.

The provision of, or funding for, additional infrastructure to support sustainable transport must be identified and agreed with LCC when the internal layout of the site is

progressed. This must satisfy needs of all users/residents consistent with guidelines and guidance.

LCC consider that it is particularly important to provide high quality sustainable transport networks for a site of this size and strategic importance.

Public Transport Provision

The developer has carried out an assessment of the Annual Patronage Forecast for the proposed development, based on a build out of 74 residential units per year. This assessment has identified that the provision of a new bus service will be sufficient to provide an attractive public transport option for residents at the site, with the number of buses and frequency of service increasing as the development becomes built out. This service may be a stand-alone service or be combined with existing services, subject to the best public transport provision which will be assessed by LCC Public Transport team. The financial contributions offered to support this level of public transport service are included within the Section 106 details, and amount to a sum of £1.7M. This level of contribution should be sufficient to deliver PT to and within the site, however it needs to be linked to appropriate agreed triggers ensuring that suitable development funded provision will be provided at all stages of build out, including the early phases.

LCC consider that the developer has demonstrated that the public transport provision that is being promoted could be designed to provide satisfactory support for the proposed development, although this provision would be subject to appropriate funding mechanisms being agreed.

Should this application be approved, LCC would require a condition within the planning decision notice that ensures that the detailed design of the site will enable the easy access of buses into and around the site and the provision of the appropriate number of bus stops and associated infrastructure to Quality Bus standard will be constructed by the developer (and maintained for an agreed period of time). Appropriate bus infrastructure should be provided to ensure that residents are within 'desirable' walking distances from all locations within the site.

LCC remain concerned about the suitability of Littlemoor Road for use by buses (of varying size) due to its width and alignment and lack of continuous footways. This link (and junctions with the internal site road network and junction with A671 Whalley Road) must be able to support two way bus movements in addition to pedestrian footways and cycleways, all to be designed and constructed to appropriate standards, ensuring network safety and management. A preliminary improvement scheme should be designed and submitted to LCC for approval to assess whether a satisfactory layout can be achieved. If a suitable design cannot be implemented, alternative options should be submitted for approval by LCC.

Travel Plan

The developer has agreed to provide an overarching Travel Plan Strategy for the whole site, with the appointment of a Travel Plan Co-ordinator for the site. SBA has

applied a 5% discount of residential trips and a 10% discount of employment trips in their traffic generation calculations for the development. To realise these discounts as proposed, a comprehensive travel plan (with realistic targets) must be agreed, implemented and maintained with suitable funding being available to the developers appointed travel plan coordinator to deliver measures/initiatives. A contribution toward the LCC Travel Planning team is also required for the provision of a range of services to support the development travel plan.

LCC would expect this Framework Travel Plan to meet all of the LCC submission criteria, including the following;

- Travel Plan Co-ordinator appointed and LCC's Travel Plan Team informed of contact details at least 1 month prior to occupation of the first dwelling.
- The first residential travel survey completed within 3 months of occupation of 100th dwelling, and employees survey within 3 months of occupation of each unit/establishment.
- The Full Travel Plan submitted to the Planning authority within 3 months of the first residents travel survey.
- Clarification of how each property would provide cycle storage.
- A commitment to review the Framework Travel Plan for the site annually for at least until full build out as applied for, or otherwise agreed with the LPA.

The Framework Travel Plan needs to include the following as a minimum

- Appointment of a named Travel Plan Co-ordinator
- Resident's and employee travel surveys for all units as they become occupied
- Details of cycling/pedestrian/public transport links to and through the site
- Provision of secure, covered cycle parking for those properties where suitable storage space is not available.
- SMART Targets for non-car modes of travel
- Action plan of measures to be introduced, and appropriate funding
- Details of arrangements for monitoring and review of the Travel Plan until full build out as applied for, or otherwise agreed with the LPA.

A contribution of £24,000 is required 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.

In addition, a suitable level of funding would also need to be made available to the **developers appointed travel plan coordinator** (and not LCC or RVBC) to deliver the necessary interventions within the travel plan. Interventions could include the provision of free Bus Passes for an initial period, bicycles and safety equipment, personalised travel planning or a variety of other travel plan initiatives and be dependent on the nature of the household targeted. This level of funding (currently) would be in the region of £300 per dwelling (because of the duration to deliver this site this figure needs to be reviewed periodically by the developer to ensure that it is sufficient to deliver the same/improved range of initiatives as originally envisaged at £300). This figure is based on calculations for similar developments in the Ribble Valley, and includes incentives for residents such as the provision of a bicycle, and/or free or subsidised bus passes.

Transport Assessment

A Transport Assessment (October 2012) has been submitted as part of the planning application for the proposed development. This has been supplemented by further correspondence by letter and emails upto an including October 2013, including SBA Ref: A077038/TN01 – 'Response to Lancashire County Council Comments regarding highway modelling'. In respect of the Transport Assessment (TA) and associated further documentation I would make the following comments;

Trip Distribution

SBA has used the 2001 Census Data to distribute the trips generated by the development. The principal of this distribution is not unreasonable, however it is important and reasonable that a baseline check is undertaken by the developer with more current census data that is currently available. This check has been requested by LCC through the assessment period. It should be noted that if more than one access were provided for this development, the dispersion of trips would be across a wider area, and have a lesser impact on one particular highway corridor.

Trip Generation

The TRICS trip rates used were extracted from the previous Royal Haskoning TA dated November 2010 and are considered acceptable for this transport assessment.

Modelling

The Transport Assessment and additional supporting information, submitted to LCC by SBA, have included junctions that are considered will be impacted by this development.

Initially SBA modelled the junctions individually, so that each operated discretely and not as a network where the operation of adjacent junctions influence others. This analysis identified that there will be significant queuing along Shawbridge Street and Pendle Road during the peak hour periods with the development. By modelling the junctions in this way, it was not possible to assess the operation of the junctions as a network. Subsequently, on request from LCC, the junctions were modelled using micro-simulation, and various network changes included, such as the construction of mini-roundabouts at the Waterloo Road/Wellgate junction and the Shawbridge Street/Taylor Street junction. In addition, Royal Haskoning considered and tested a number of local route redistributions in this area which reduced traffic flows/impacts at the key junctions with results presented.

The additional modelling that was undertaken by SBA was provided via email on 15th October 2013. This further modelling work identified that the construction of a mini-roundabout at the Waterloo Road/Wellgate junction would, under a specific redistribution scenario, reduce the level of impact in the future year with full development. However, whilst queues are lower than the original submitted highway changes option, they are significantly higher than those which currently occur. During

off peak periods, the roundabout would give more balanced priority amongst all road users.

SBA have investigated the re-distribution of traffic by routing vehicles to alternative routes that traffic may use during congested peak hour periods and manually adjusting the model inputs with the reduced flows. As expected this reduces the delays experienced at the key junctions, although delays continue past the peak hour period along Shawbridge Street and Waterloo Road.

Alternative options considered:

Option 1: SBA label as 'full relief option': traffic travelling down Taylor Street but then wishing to turn right to Shawbridge Street, right to Waterloo Road and then north, could alternatively use Holden Street. SBA has removed that traffic from the model to replicate the fact that it would use Holden Street. A similar adjustment has been made to traffic travelling down Wellgate and turning south through the Waterloo Road and Shawbridge Street junction. That traffic could alternatively use Lowergate.

Option 2: SBA label as 'half pressure relief option': The second series of assessments which SBA has undertaken, whereby just 50% of the above manual adjustments in option 1 have been made.

The following table highlights differences in modelled scenarios and the level of queuing predicted at Shawbridge Street.

Shawbridge Street:

| Modelling Scenario | Ave Q (over 60mins) (pcu) | Max Q (over 5mins) (pcu) | Journey Time Ave (over 60mins) (s) |
|---|---------------------------------|--------------------------------|--|
| TA results Table 5.7 Base (2030) | Not available | 12 | 42 |
| TA results Table 5.7 Base + dev (2030) | Not available | 110 | 346 |
| Option 1 (at 08.55hrs time period) | 27 | 60 | 236 |
| Option2 (at 08.55hrs time period) | 63 | 93 | 339 |

The table above compiles the modelling results for the operation of the Shawbridge Street/Waterloo Road mini-roundabout, showing queue lengths and average journey times for Shawbridge Street. It can be seen that by using a micro-simulated model and re-distributing the traffic flows along various different routes SBA have been able to influence the queue lengths, however it remains that the construction of a development of this size, using the single access onto one highway link, results in queuing of considerable lengths during the peak hours and beyond. The queuing that is projected by the model far exceeds the current level of queuing experienced, with the maximum queues that have been modelled along Shawbridge Street being calculated as being between 390m and 717m.

It must be noted that the presented journey times are based on a distance of 1200m which is much greater than the predicted queue length, which could be misleading

when vehicle speed is considered on its length. The above results also include discounting as highlighted in the TA and above.

Any congestion experienced at these junctions will also have an impact on public transport service and journey times.

Parking

Parking provision for all elements of development within the site should be in line with appropriate standards.

The internal development site layout of this outline application is to be dealt with at reserved matters and therefore has not been addressed in detail within the Transport Assessment. While I acknowledge the outline nature of the application I would note the need to ensure the development provides appropriate levels of secure, covered, cycle and motorcycle parking and provision for mobility impaired users.

If approval is granted the developer should enter into early discussions with the LHA to agree all outstanding highway related matters.

In line with recent government policy, it is requested that the development provide electric vehicle charging infrastructure at appropriate locations.

Servicing, Delivery, Waste Collection and Routing

A Service, Delivery, Waste Collection and Routing Strategy must be developed and agreed with LCC and Ribble Valley Borough Council to ensure that all deliveries, servicing and waste collection can be undertaken safely without creating conflict with other vehicles, pedestrians or cyclists.

Construction Strategy and Phasing

Prior to any commencement of the development, the developer shall submit a construction phasing plan, including off-site highways works, for approval by the Local Planning Authority and the Highway Authority.

Planning Obligations

It is critical in delivering development within this, at times, congested local network, that suitable measures and sufficient planning obligation are provided to reduce the impact of this development and support sustainable development and communities. It is important that the network can maintain a level of reliability at all times of day for all transport modes, including public transport and that any increase in congestion can be suitably managed as not to cause local network gridlock.

Highway/Transport Works

LCC consider that further necessary supporting measures will be required to reduce the impact and influence of this development and to deliver sustainable development. The impact of this development could be managed if a package of measures, which **have yet to be fully identified**, were delivered through Section 278 works and planning contributions.

It is clear that any development in this location would require significant additional improvements to public transport (services and infrastructure) pedestrian and cycle infrastructure as well as highway improvements to deliver sustainable development and minimise the dependence on the private car. All parties have worked to develop a highway scheme with an aim to mitigate against vehicle related impacts in the area of Shawbridge Street, Taylor Road/Waterloo Road/Wellgate. The LCC based scheme did deliver sustainable/amenity benefits and had negative (limited) impacts on queuing and delay as highlighted through the supporting detailed micro-simulation analysis produced by Royal Haskoning. It is expected that other improvements will be required at the existing roundabout junction of A59/A671 as previously highlighted through recent appeals.

Section 278

The highway works that are required to enable this development have not been fully identified at this time. However the following highway works which have been identified by the applicant's highway consultant will be included;

1. Construction of a roundabout junction at Pendle Road/A59

It must be stressed that the s278 works (not fully identified at this stage) on their own, without the sustainable links through the site and on to the wider network, will not provide the level of mitigation necessary to make this development acceptable to the LHA.

Section 106

The highway works required to enable this development, to be funded through a Section 106 agreement, have not been fully identified at this time. However, the following items, which have been identified by the applicant's highway consultant, should be funded by the developer through a S106 agreement;

1. Funding for the provision of 1 no. 28 seater bus for the first eight years of development, followed by funding for 2 no. 28 seater buses for the following 7 years minimum (or until site is fully built out). £1.1M to support the service, based on annual operating costs.
2. Funding of 2 no. 28 seater buses for a five year period following full build out (or otherwise determined by the LPA in consultation with the developer, to overcome the risk on a scenario that the full site is not delivered) of the site. £600,000 to deliver two buses for five years incorporating an enhanced peak hour service.

3. Travel Plan Co-ordinator: Funding to provide assistance with respect to the Travel Plan support, promotion, surveying, monitoring and evaluation. £25,000 per annum.
4. Funding available for travel plan co-ordinator to deliver the necessary interventions within the travel plan. Interventions could include the provision of free Bus Passes for an initial period, bicycles and safety equipment, personalised travel planning or a variety of other travel plan. This level of funding would be in the region of £300 per dwelling (see section on Travel Plan).
5. Improvement of cycle routes into Clitheroe Town Centre, such as the upgrading of the A671 from a pelican crossing to a toucan crossing, and providing cycle paths to link to neighbouring junctions.
6. Cycle parking at the railway station to encourage cycle journeys to the station, allowing access to the greater environment.
7. Funding toward a combined footway/cycleway from development, across Pendle Way to Worston. Estimated cost £150,000

Conclusion

The location of this development requires significant investment in the sustainable links that connect this site to the wider transport network, to jobs, services and recreational facilities.

Lancashire County Council remains concerned that a development of this size has only one primary access leading onto one strategic highway corridor, limiting the route choice available from the site for motorised users, limiting dispersion of the traffic onto the surrounding highway network and impacts (queuing/delays) around the Shawbridge Street /Waterloo Road/Taylor Street linked junctions. LCC is not able to support this application as it has currently been submitted with only one primary vehicular access and the resulting queuing and delays as predicted at the highlighted location.

The proposed development layout currently consists of a cul-de-sac which offers limited permeability/connectivity to the existing highway network/built environment (negatively influencing distance travelled by private vehicles) for a large mixed use development. LCC consider that the provision of a secondary access onto the A671 corridor would allow enhanced integration of the site with the existing built up environment and existing highway network, allowing the impact of the additional development flows to be distributed throughout a wider area on more direct (shorter) desire lines, resulting in a lesser impact on fewer unsuitable junctions.

If the Local Planning Authority is minded to grant planning approval, LCC would require further consultation and agreement regarding the site access arrangements and full mitigation for all modes when an application is made regarding the reserved matters. This is in addition to information regarding other elements such as sustainable transport measures, its funding and delivery.

If the LPA is minded to grant approval I would like the opportunity to offer planning conditions that the LHA consider appropriate.

I hope the above is of assistance.

Yours faithfully



Neil Stevens
Strategic Highways Planning Manager