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Your ref: CONEH/3/2014/0764
Our ref: 03/14/0764/SHP/DRA
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FAO Daniela Ripa

Dear Daniela

**Application 03/2014/0764 - Development of 520 homes including affordable housing and housing for the elderly, relocation of Longridge cricket club to provide a new cricket ground, pavilion, car park and associated facilities, new primary school, vehicular and pedestrian access landscaping and public open space, with all matters reserved apart from access.
Land at Chipping Lane, Longridge.
Applicant Barratt Homes**

I refer to the above application, the Transport Assessment (TA) dated August 2014 produced by Vectos and the other documents in support of the application by Barratt Homes.

Lancashire County Council (LCC) 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 and junctions in the most congested transport corridors. With this in mind the present and proposed traffic systems have been considered in and around the area of the proposed development including the strategic influence. The LHA has concerns as the network beyond the site does suffer from a level of congestion, with queuing occurring at peak times on the A6/B5269 corridor (Broughton/Fulwood) and B6243 corridor Grimsagh/ Ribbleton between Longridge and Preston.

It is essential that the developer demonstrates that the development site can satisfy the NPPF foundation of providing for sustainable transport. Thus any application must incorporate a package of sustainable transport measures to address the issues relating to the provision for public transport, cycling and walking modes.

Development

The development proposals are for outline planning permission for 520 dwellings and a new primary school, which will be accessed off Chipping Lane via two new junctions. A priority junction with a ghost island right turn facility approximately 110m north of the existing Inglewhite Road junction and the provision of a secondary priority junction 150m further north.

Transport assessment

Supporting documents have been produced and submitted which include a Transport Assessment dated August 2014. While the broad scope of the TA was discussed with Vectos pre-application, there is a difference of opinion regarding important parameters (representative trip generation rates, the base traffic model, the validation of the traffic model, and outcomes of the analysis).

As submitted it is not possible or appropriate for LCC to complete a comprehensive review of the TA due to the inclusion of questionable assumptions in the traffic modelling and outcomes in the analysis. The attached LCC note; *"Proposed Residential Development (520 units) and new primary school, Land East of Chipping Lane, Longridge. LCC Transport Assessment Comments on submitted TA by Vectos"*, dated 1 December 2014 contains detailed comments on the submitted TA.

Access arrangements

The principle of the proposed junction arrangements is a reasonable access solution; in addition to catering for vehicular access and if designed well it has potential to support both a quality and a safe means for pedestrian/cycle access links to the existing built environment. However, as submitted the applicant has not demonstrated that the proposed access is acceptable. Failure by the developer to provide for a safe and adequate means of access and (for all modes) would be grounds for objection to the application on both highway safety and policy grounds (NPPF).

For specific comments please refer to the LCC note; *"Proposed Residential Development (520 units) and new primary school, Land East of Chipping Lane, Longridge. LCC Transport Assessment Comments on submitted TA by Vectos"*, dated 1 December 2014.

Sustainability

The site has the potential to provide for the safe and reasonably direct movement of pedestrians and cyclist to access to network in all directions, including access to bus stops. This requires the agreement on bus stop upgrades, together with improved footway/cycleway linkages.

For specific comments please refer to the LCC note; *"Proposed Residential Development (520 units) and new primary school, Land East of Chipping Lane, Longridge. LCC Transport Assessment Comments on submitted TA by Vectos"*, dated 1 December 2014.

Longridge Loop – Proposed Cycle/Walking Route around Longridge

I attach a plan of the Longridge Loop, which the Town Council produced. The route would link the proposed developments round the town either with a cycle route into Preston on the old railway or B roads. Parts of the route are through private land or on public footpaths so the alignment shown on the plan might be difficult to implement. However there are probably enough variants on the route to make the whole route possible.

In connection with this site, the most suitable route for a Longridge Loop would be through the public open space on the north of the site. LCC have suggested that the Town Council contact the Borough Council direct to say what route they would like through this site.

Wider Highway Impacts - Recent Development proposals in North Preston and Central Lancashire Highways and Transport Masterplan

An important highway consideration is the scale of emerging development proposals as set out in the adopted Central Lancashire Core Strategy and the proposed development in Longridge reliance on transport routes west to and/or through Preston. The Lancashire Core Strategy sets out the basis for planning in Central Lancashire over the next 15 years and details Strategic Sites and Strategic Locations where development will be focused and infrastructure improvements. Given the developments proximity to the Preston City boundary and reliance on the road network in Preston, it would not be appropriate to consider the development traffic impacts in just Ribble Valley. Therefore, it is critical that the impact of this development does not compromise the existing or future movement of people and goods by any mode, or the ability to promote infrastructure to accommodate (or at least maximise) planned growth in both Ribble Valley and Preston/Central Lancashire.

The County Council continues to support development, with the important proviso that delivery of the scale and distribution of development in Central Lancashire will necessitate major additions to existing transport infrastructure funded by development. The appropriate and necessary additional highway and transport provision to support movement on key corridors in Preston is included in the Central Lancashire Highways and Transport Masterplan (CLHTM, adopted by LCC March 2013), which indicates that developers appropriately contribute to its delivery, (together with education, health and other key community infrastructure).

The Central Lancashire Highways and Transport Masterplan set out a future highways and transport strategy linked to economic development and spatial planning priorities, including those set out in the Central Lancashire Core Strategy. The CLHTM identifies major improvements in Appendix 1, which includes; Preston Western Distributor Road, Broughton Congestion Relief, M55 Junction 1 (already part delivered), M6 at Junction 32, and the Longridge-Grimsargh-Ribbleton-Preston City Centre Public Transport Priority Network. It is anticipated that these combined measures will address existing highway congestion in north Preston and provide additional capacity for the allocations in the Core Strategy funded by developers via CIL contributions.

The additional vehicles generated by this proposed development will result in higher flows on the existing surrounding network including that on the A6 corridor, (at Junction 1 of the M55) and on the B5269 and B6243 corridors between Longridge and Preston (and M6 motorway). There is real concern with the proposed development that its traffic generation combined with other potential development in Wyre, Fylde and Ribble Valley will "take-up" the planned capacity on the wider network. It is fair and reasonable that the proposed development make a contribution related to the scale of development to the necessary infrastructure to support this application. Developer contributions are sought to deliver improvements to support the principles of the CLHTM to develop highway capacity at the A6/M55 interchange; and towards the Longridge ~ Grimsargh ~ Ribbleton ~ Preston City Centre bus route (as a public transport priority corridor, with measures that follow a public realm approach to support sustainable transport movements and improve the operation of junctions and service reliability along this corridor).

Travel Plan

This development is in excess of our Travel Plan submission threshold. An Interim Travel Plan for the site has been developed and specific feedback on this document is provided below.

Framework/Interim Travel Plan submission criteria:

- ***Commitment and timescale for the appointment of a Travel Plan Coordinator (suggest at least 1 month prior to first occupation).***

This information is included. In addition to the duties listed, it would be desirable if the Travel Plan Coordinator could liaise with the Cricket Club and new School to make them aware of the Residential Travel Plan and measures contained therein. The new school should be developing its own travel plan, and there may well be areas of overlap and potential for co-operation.

- ***A commitment and timescale to undertake travel surveys (recommend within 3 months of reaching 100 dwellings occupied [200+ units])***

There is a commitment to undertake initial surveys but the document is slightly unclear with regard to the timing of this. 6.1.4 states 'Travel surveys will be undertaken within 3 months of reaching 75% of dwellings occupied (80 units occupied).' Later in the document, 8.4.5 states 'Travel surveys will be undertaken at the development when 90% of dwellings are occupied.' Our recommendation for a development of this size, is that the first survey should be undertaken within 3 months of reaching 100 dwellings occupied.

- ***A commitment and timescale for the development of a Full Travel Plan (recommend within 3 months of 1st travel survey)***

This information is included, although I would draw attention to the fact that the terms 'Final' Travel Plan and 'Full' Travel Plan are used interchangeably throughout the document – we would recommend the use of the term 'Full Travel Plan' exclusively.

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

This information is provided, but should be expanded upon in the Full Travel Plan.

- ***Details of the provision of cycle parking for any properties where suitable storage is not available***

Whilst a commitment has been made to provide information regarding this in the Full Travel Plan (8.2.1), no information is provided in this document.

- ***List of any proposed measures to be introduced particularly any to be implemented prior to the development of the Full Travel Plan***

Several details are provided, but the chart at 8.1.1 would benefit from a clear indication of who is responsible for which action, and I would expect to see this in the Full Travel Plan. Whilst there is a commitment to provide Travel Packs to households 'within 6 weeks of first occupation' (8.1.1), this is rather later than we require – they need to be available from 1st occupation.

It would also be helpful to include in the Action Plan table (8.1.1) all of the initiatives mentioned in the Travel Plan where there is a commitment to carry them out – for instance those mentioned at 5.7.1 are not included in the Action Plan.

- ***Details of arrangements for monitoring and review of the Travel Plan for a period of at least 5 years.***

This information is included.

I am afraid this Interim Travel Plan does not meet LCC criteria.

It is important that the Interim Travel Plan is adhered to and that a Full Travel Plan is developed and implemented in line with agreed timescales. The Full Travel Plan when developed would need to include the following as a minimum:

- Contact details of a named Travel Plan Co-ordinator
- Results from residents travel survey
- Details of cycling, pedestrian and/or public transport links to and through the site
- Details of the provision of cycle parking for any properties where suitable storage is not available.
- Objectives
- SMART Targets for non-car modes of travel, taking into account the baseline data from the survey
- Action plan of measures to be introduced, and appropriate funding
- Details of arrangements for monitoring and review of the Travel Plan for a period of at least 5 years

On a development of this size LCC would normally request a contribution of **£24,000** to enable Lancashire County Councils Travel Planning Team to provide a range of services as outlined below.

Section 106 contributions will primarily be used to enable the Sustainable Travel Team to:

- Appraise Travel Plan(s) submitted to the Planning Authority and provide constructive feedback.

- Oversee the progression from Framework to Full Travel Plan in line with agreed timescales.
- Monitor the development, implementation and review of the Travel Plan for a period of up to 5 years.
- Support the development and implementation of the Travel Plan.
- Develop and provide online, mode of travel surveys and collation of returns for baseline and subsequent monitoring purposes.
- Attend meetings with developer/occupier/co-ordinator as necessary.
- Provide access to leaflets, publicity, maps and information – provision of bespoke literature and large quantities may be subject to additional charges.
- Conduct a basic site audit.
- Provide localised maps and plans, GIS mapping of staff postcodes or other origin and destination data, accessibility plot of public transport, walking and cycling routes/thresholds to site.
- Advise and offer appropriate support with implementation or suitability of specific elements or measures.
- Assist with the development of sustainable travel directions for web pages and other appropriate content.
- Help stage promotional events and activities including Walk to Work Week, Bike Week, car free days or measured mile walks etc.

Funding to support the measures and achieve the targets of the Full Travel Plan

LCC would expect the TA to include Funding to support the measures and achieve the targets of the Full Travel Plan. While a number of potential measures are included for consideration as part of the outline Travel Plan. However, without a commitment to funding these measures they cannot be implemented and therefore the benefits of the Travel Plan will be overstated.

The development of sustainable measures is a key to our agreement to development trip rates targets within the TA/TP, without these measures these rates are unlikely to be achieved.

Notwithstanding necessary and appropriate sustainable transport service provisions and new infrastructure links/upgrades, LCC request that a sustainable transport contribution of £260 per unit is included in the S106 to deliver a range of necessary Personalised Travel Plan Measures as set out below:

- Public Transport Smartcards for households to encourage sustainable patterns from the outset of the development. (£110 towards bus fares)
- Provision of cycles and safety equipment for households (£150 cycle contribution)

LCC are satisfied that this request meets the requirements of the CIL regulations, and on balance, an overall package of measures is appropriate and necessary to minimise the impact of this proposal and support a sustainable development. Agreement of the

targets to be set within the Full Travel Plan should be progressed as soon as possible to support this approach.

Planning Conditions

Given the current lack of agreement on the access for the residential development, appropriate planning conditions are yet to be produced by LCC. However, should your Council be minded to approve the application I would be pleased to work with you to agree a list of appropriate conditions.

Summary

Lancashire County Council takes its responsibility seriously with respect to the current and future use of the highway network whilst also giving a high priority to supporting growth in the key economic centres; including supporting private sector led economic growth, the creation of jobs and access to employment, education and training.

As submitted, currently LCC do not support this development proposal for the following reasons:

- Failure to demonstrate a safe and adequate access with provision for all highway users. Further evidence and support is required with regard to the detail and operation of the proposed site access and the analysis of junctions on the local highway network.
- Lack of information, support (financial and or infrastructure provision) and commitment with regard to satisfying the sustainability needs of this site. The development must provide/ support sustainable transport measures to address the issues relating to the provision for public transport infrastructure, together with cycling and walking connections to appropriately integrate with both the existing environment and all future development phases, and satisfy the NPPF foundation of providing for sustainable transport.

Note: The applicant may wish to submit revised plans, details, evidence and commitment, if acceptable may overcome the local element of this reason.

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.

Yours sincerely



David Allen
Strategic Highways Planning