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TOWN AND COUNTRY PLANNING ACT 1990

Application Ref 3/2019/0545

Proposed mixed use development land between Clitheroe Road and A59/A671 roundabout junction, Barrow

I refer to the above proposal and would like to thank you for the opportunity to provide highway comments. Lancashire County Council (LCC) as the Local Highway Authority is responsible for providing and maintaining a safe and reliable highway network. With this in mind, the present and proposed highway systems have been considered to highlight areas of concern that potentially could cause problems for the public (familiar and unfamiliar), cyclists, public transport, motorists and other vehicles in and around the area of the development.

Unfortunately, this proposal did not include the benefits of pre-application discussions and no discussions have taken place in the preparation of this application with the highway authority. Notwithstanding this, VECTOS does have the benefit of historic knowledge of the wider Barrow area representing other applicants.

The following executive summary provides the current position based on the submitted documentation. I would welcome dialogue with the applicants transport consultant to allow matters be suitably concluded.

Executive Summary and Recommendation

There are concerns with analysis as presented, as a consequence the level of impact is currently unknown to whether the level of motorised trips can be accommodated in the surrounding network. No evidence has been presented that demonstrates that the A59/A671 roundabout satisfies current design standards (all arms). In addition I am not satisfied that the hybrid layout/access strategy satisfies users needs and I also have safety concerns. To a lesser extent from a sustainability perspective it appears that most of the employment is beyond 400m of a bus stop, this is a weakness. The supporting travel plan framework is very limited in content and does not provide

certainty that the site will be made sustainable and ambitious targets will be set, met and sustained.

Lancashire County Council is unable to support the application as presents due to lack of information and is not currently satisfied that a safe and suitable access (to and within) has been provided. The layout detail does not satisfy all modes and users needs. It is disappointing that the site layout and infrastructure has not exploited existing opportunities by strengthening linkages from Barrow to the A59 for the existing and new community.

1.0 Site Location

The site is located to the east of Clitheroe Road, Barrow and to the north of the A59.

2.0 Development Description

Hybrid planning application for mixed use development.

In full: the erection of 48 bungalows for persons aged 55 years and over (C3) and a 64 bedroom care home (C2) (with vehicular and pedestrian access from Clitheroe Road) and a drive-thru restaurant (A3) and associated customer car parking (with vehicular access from the A59).

In outline: all matters reserved except access, employment units (being B1 and or B2 and or B8) and a petrol filling station (sui generis) and convenience store (A1) with associated customer car parking and vehicular access from the A59.

3.0 Motorised Access and Sustainable Provision

The access strategy for motorised vehicles is via a new priority junction from Clitheroe Rd/Whalley Rd (Barrow) for the residential and care home elements. All other uses is from a new access onto the A59/A671 roundabout. Ped/cycle linkages are indicated between residential and employment/PFS/drive through elements.

3.1 Motorised Access via the A59/A671

I do not challenge the principle that the site could be served off the A59/A671 roundabout via a new 4th arm, however no evidence has been presented that the full roundabout with the 4th arm satisfies all current design standards. Notwithstanding design standards are a number of operational matters which will need to be picked up to overcome my safety issues such as:

- fast entry into the roundabout from the west (existing arm) with a slow exit into your site. This could result in rear end shunts.
- conflict as a consequence of local proposed access points (entering the PFS and enter/exit the drive through) in close proximity to the roundabout, slow circulating speed on the spine road due to road alignment. These events could result in vehicles waiting within the roundabout and is a safety concern.

Once I am satisfied with the roundabout and connecting road into the site (from a layout and modelling perspective), as the existing junction forms part of a high speed corridor it is important that a S1 safety audit is produced and fully satisfied. Hedges/trees will need to be trimmed back/removed as part of the scheme. It is not clear on the verge/foot/cycleway extent as part of the 4th arm layout.

Notes: The modelling undertaken does not replicate the existing situation with its dedicated west to east lane. The model with development is currently not acceptable.

As the road from the roundabout only satisfies commercial purposes has no public utility, with this, it cannot be considered suitable for adoption. See section on layout matters for further comments.

3.2 Motorised access onto Whalley Rd/Clitheroe Rd corridor

I have no concerns with the access location and that visibility can be achieved. However the plans do not indicate the extend of new cycle/footway on Whalley Rd/Clitheroe Rd. the foot/cycleway detail as presented at Lamb Roe Gardens is misleading (no foot/cycle way currently exists. Notwithstanding these anomalies, once the extent is agreed, safe crossing provision over Whalley Rd/Clitheroe Rd will be required to support movements from the site to the south as well as dropped crossings at Lamb Roe Gardens. In addition consideration to need to be given to overcome visibility issues between ped/cyclists and motorists from Lamb Roe Gardens.

The 2 side roads onto the proposed residential spine road are approximately 7m away from the site junction. This could result in vehicles waiting within the junction mouth as a vehicle exits, in addition, also promotes poor use of the highway for certain movements. Further proposed trees could also hinder visibility. These are safety issues.

*Notes: I have concerns with the internal road widths as proposed to support a large car and a service vehicle including wing mirrors and also having regard to the bend within the spine road. I am aware of the source of the 4.8m and 5.5m as being from MfS, however as stated **they are NOT necessarily recommendations.***

Hedges will need to be trimmed back as part of the scheme.

See section on layout matters for further comments including what could be considered for adoption (assuming all design matters are satisfied).

3.3 Sustainable provision and wider connectivity

The non-motorised provision linking both sections of the proposed site need to be available and useable at all times of year whether day/night time therefore must be illuminated and constructed using a permanent material with appropriate drainage provision (and maintained by a site maintenance company and controlled by a legal agreement). Hedges will need to be trimmed back as part of the scheme. All sustainable provision linked to a planning condition which requires the above to be satisfied and that it be fit for purpose and open for use prior to the occupation of any building irrespective of phasing.

Whilst a route is proposed (see section on layout for further comments) it appears that most of the employment is beyond 400m of a bus stop. The detail is not clear on the widths of the footways or the foot/cycle ways throughout the site providing access to all units (whether residential, employment/drive through or PFS).

I have concerns with the supporting travel plan and that the site is considered sustainable and can be maintained as such, this relates to each element and for the proposal as a whole. See section on Travel Plan.

3.4 Layout matters

3.4.1 Commercial Layout (Employment/PFS and drive through)

The access onto the A59 high speed road provides a point of motorised access which is acceptable as a junction form, however there are design matters and operational matters that need to be overcome.

Whilst a footway is being promoted at the roundabout access, as presented does not provide any benefit, as a suggestion it could be extended to include existing footways linking into FP6/11 circa a further 50m to the east and I would also suggest provision to be provided extending a further 20m to the west.

The swept paths for the 'Drive Through' for the purposes of delivery/waste collection does appear to be very close to parking bays which are 4.8mx2.4m (these are historic sizes and do not necessarily satisfy large cars/SUV's or vans), this does not allow for any error by the delivery/waste collection driver and requires cars/vans to be parked within bays which is unlikely. I note that a 10.2m service vehicle has been used, I am aware that a number of LPA's are now using an 11m vehicle for waste collection. This needs to be confirmed as well being suitable for commercial collections. No swept path have been produced at the access (in and out). Right turn storage is required on the link road into the drive through.

Note a large SUV is circa 5m x2m (Volvo SC90) in length a mid-size van 5.5m-6.7mx2.1m (Ford Transit).

As the site is close to the A59 which is used by many medium/large vehicles, no provision is proposed to support these drivers accessing the hot food/drink provision at the drive through. This is likely to result in medium/large vehicles parking on the access road.

No swept path analysis has been undertaken for the PFS for deliveries and for HGV's which I assume will also use the provision. No swept path analysis has been undertaken at the access points (in and out at the separate locations). If HGV's can use the provision I would expect sufficient waiting and manoeuvring provision within the PFS to support the needs of vehicles.

There appears to be limited forward visibility between the PFS exit and exit from units 6-13.

The footway provision between the residential and the PFS, whilst it is supported the desire line is located at a point with limited visibility on the PFS side.

A HGV requires the full road width to access/egress units 6-13. Again a HGV accessing units 1-5+14 will be manoeuvring beyond the centre line with limited forward visibility.

Whilst I note a HGV can manoeuvre within the communal service yard there is no provision for parking or to make deliveries using these vehicles.

What provision is in place to negate against HGV's using the site for overnight parking.

The layout as presented is for commercial purposes and does not provide suitable utility, therefore will not be adopted.

Parking provision is highlighted under a separate heading.

Employment link road through the site with access points as designed will result in conflict within in the site which will impact on the public highway beyond the site. Changes are necessary within.

3.4.2 Residential Layout

At this stage I am not sure what elements (if any) that the developer would wish to be adopted. All deliveries and waste collection to be undertaken including manoeuvring to be undertaken within provision provided negating against third parties placing restriction in place such as barriers. At this stage as presented, the layout is not suitable for adoption.

3.4.3 Care Home

Requires waste collection and deliveries to utilise the entrance of the car park and requires the manoeuvring to be undertaken blind in an environment which includes vulnerable residents. I assume the waste is stored in the western point of the car park requiring the waste vehicle to reverse the full distance. How are deliveries made to the Care Home not impeding on the car park operation?

3.4.4 Dwellings

There are a number of properties where access to off road parking provision is limited or difficult to access/egress. A number of the cul-de-sacs whilst they will be private and not suitable for adoption, no provision is made for deliveries or to support a manoeuvring vehicle and safe waste collection.

There is limited forward visibility with the highways at the bend

As highlighted within the plans the 2 side roads onto the spine road are approximately 7m away from the site junction. This could result in vehicles waiting within the junction mouth as a vehicle exits, in addition also promotes poor use of the highway for certain

movements. Proposed trees could also hinder visibility. This layout is not suitable for waste collection. This detail is not acceptable.

With regard to road widths again as highlighted in para 3.2 I have concerns with the internal road widths as proposed to support a large car and a service vehicle including wing mirrors and also having regard to the bend within the spine road. A number of details will require to be modified before the layout can be considered suitable.

3.5 Electric charging points

The TA indicates that electric charging points to be agreed with LCC, as no pre-application discussions have taken place, no agreement has been made. Notwithstanding this all dwellings to include a charging facilities and I would require the PFS/drive through to have fast charge provision with some future provision for the employment element.

It is important that the provision which is yet to be agreed can be expanded on without disruption, with this I would suggest that addition ducting within car parks to be provided future proofing the site.

3.6 Parking Standards

Whilst the TA indicates that parking has been [provided in accordance with LCC standards. It is important that each unit has sufficient provision and for specific uses such as the drive through, and there is an evidence base that highlights sufficient provision for a typical day using agreed trip rates (yet to be agreed) i.e. car park accumulation.

3.6.1 Employment

Having regard to the location of the site and the GFA of each unit (with units being B1/B2/B8) having 1 space per 50m², I consider to be insufficient. I would be looking at circa 1 space per 40m. Each unit needs to have dedicated parking to satisfy needs and identified on a plan.

Note as no through route is being proposed it is likely that some local employees will park in the residential area and walk to their place of employment, this will be exacerbated if insufficient parking provision is provided on site.

3.6.2 Care Home

The Care Home is for 64 residents by my calculations equates to 13 spaces, 31 spaces are proposed, this appears to be an overprovision.

3.6.3 Drive through

A 170m² GFA Drive through by my calculations equates to 34 spaces, this is as proposed. Notwithstanding this, car parking accumulation analysis is required using trip rates yet to be agreed.

3.6.4 PFS

An 8 pump PFS with 280m² of retail equates to a 28 spaces, 24 spaces are proposed which should satisfy demand.

3.6.5 Residential

Assuming the bungalows are circa 2 bedrooms would require 2 spaces per dwelling, 1 bed bungalows would be 1 space.

4.0 PROW

The PROW will need to be relocated to support the development.

5.0 Accident Review

The TA has reviewed accident data in the vicinity of the site and concludes that '*based on the accident analysis it is therefore confirmed that there are no existing highway safety issues in the vicinity of the site*', I do not disagree with their conclusion on this matter.

6.0 Travel Plan

A one page travel plan framework has been submitted. It does not provide sufficient information or commitment /financial commitment that this mixed use development will or can be made sustainable. This is not acceptable as presented.

A financial commitment is required from the developer to ensure appropriate funding is available to support delivery of initiatives/measures to satisfy and maintain Travel Plan targets.

Note: This funding would only be required to be used by the developer if their Travel Plan targets are not achieved (funding to be made available to the developers appointed travel plan coordinator and not passed to the LPA or the LHA). It is recommended that the level of financial commitment/funding must be sufficient to deliver a real change to more sustainable modes. For example sufficient to fund a bicycle (and safety equipment) for each household. LCC consider funding of £250 per dwelling is appropriate for this site with additional financial commitment for the employment element. All commitments to be retained by the developers appointed travel plan coordinator for 5 years for each dwelling/unit from first occupation.

7.0 Analysis of network and local junctions

7.1 Traffic Growth

The TA has applied an assessment year of 5 years post submission date. Whilst this may be in line with guidance (reasonable regard must be had to full site buildout). As

presented this is a further weakness of the application, when regard is had to the scale of application and that elements are in full/outline.

Alternative assumptions have been applied to TEMPRO as VECTOS suggest to remove double counting of dwellings as a consequence of permitted housing which is separately included within the analysis. This results in a growth of around 0.34% per year. No regard has been given to other aspects of growth such as the influence of construction of the committed developments or other external influences. Traffic growth and assumptions included in growth is based on an area wide approach. It is unreasonable that growth on Whalley Rd/Clitheroe Rd is identical to the A59.

7.2 Committed Development

A number of committed developments have been considered such as Barrowlands. The TA highlights that reserved applications have been approved for 408 units which is less than the outline site of 504. In the analysis for the Barrowland application regard was had to the Lawonsteads link providing relief to Whalley which was a concern at the time. I am informed that the Lawonsteads application and the link road are progressing through due process. To overcome a concern and the lack of wider consideration within this TA that there would be merit in having a Grampian type condition on the commencement of the link road at the A671 end which is not in the county councils control to deliver.

Lawsonsteads has approval for 214 units which is less than the 260 dwellings. Consideration has also been given to land at Mitton Rd and Standen. I do note that Vectos have extrapolated Standen's analysis to take account of the impacts on the A59 and A671. The inclusion of the Standen analysis is supported, however I would expect that some local traffic would use Whalley Rd especially with the provision/amenities that are located there such education and the rail station.

7.3 Trip Rates

Vectos have used TRICS software package to determine trip rates per land use. I do have a number of concerns

7.3.1 Employment

Having regard to the location and the GFA of each unit (with units being B1/B2/B8) the trip rates proposed are not supported (I disagree with the input parameters the biggest difference is GFA range). My levels of generation are slightly higher. On occasions TRICS does provide anomalies and in this case we know 14 units are proposed and VECTOS suggest that each unit will only attract 0.64 vehicles, this is unlikely.

7.3.2 Care Home

I do not have any comments to make with regard to The Care Home

7.3.3 Drive Through

Having regard to the location and scale of the drivethrough, the trip rates proposed are not supported (I disagree with the input parameters the biggest difference is GFA range). My level of generation is significantly higher. Based on that submitted only suggests that 5 trips will be attracted in the AM peak hour which is unlikely.

Note: I have collected some comparison data on the 7th January 2020 at the McDonalds at the next roundabout on the A59 during the AM which indicates that site attracts 78 vehicles. This is a notable difference to that proposed by VECTOS.

7.3.4 PFS

Having regard to the location of the proposed 8 pump PFS with retail the trip rates proposed are not supported. My level of TRICS generation is higher.

Note: I have collected some comparison data on the 7th January 2020 at the PFS with food at the next roundabout on the A59 during the AM which indicates that site attracts 61 vehicles. This is a slight difference, however my TRICS data would be much higher. With regard to linkages between the PFS and McDonalds was very limited, i.e. much lower than that proposed by VECTOS.

7.3.5 Residential

General trip rates have been used and for the AM are acceptable and for the PM the proposed rates are slightly lower than what would be expected for a privately owned mixed development site. However, as this site is for residential bungalows for the over 55, with this are acceptable.

7.3.5 Cross Visitation and Pass By

Having regard to the location of the development a 50% pass by is acceptable and could be slightly higher. However I do not support a 20% cross visitation. Based on that described in the TA discounting at 20% has been made against the primary PFS trip rates.

Notes: Notwithstanding the differences in the trip rates etc based on the approach proposed does not make sense as the Drive Through AM generation is 5 whereas the PFS is 57.

Most PFS with food also have hot drinks etc to take away, influencing cross visitation.

During the survey of the 7th January limited cross visitation was made between the PFS and McDonalds. I would be happy if surveys were taken at the A59 site and be revised to represent this site, it would also be useful to understand how the cars parks and local network operates during the weekday and weekend.

7.4 Distribution

The TA only includes a distribution image of Ribble Valley MSOA 007. No detail is clear, further information is required.

7.4.1 Residential

I disagree with the distribution proposed. I must highlight the distribution proposes 72% of the residential trips to use the constrained Wiswell Lane. As a suggestion it makes sense to use the distribution as agreed for Barrow Lands (which was produced by Vectos and tested at appeal).

7.4.2 Employment

I cannot locate the supporting evidence in the TA

7.5 Modelled area

The only existing junction considered is the A59/A671 site access roundabout. In addition the new priority access is also modelled. No regard is had to junctions or locations elsewhere which have been subject to appeals such as conditions in Whalley or Whalley Rd junction with A671 (Whalley Rd). Whilst I don't necessarily require other junctions to be modelled I consider it important that a clear audit trail is provided to why no other junctions are required to be modelled, having regard to existing levels of delay and operation and what changes are planned.

I have not reviewed the modelling as a number of matters need to be resolved first, however I do note that the access roundabout in the base scenario is modelled incorrectly as it does not include the freeflow lane that is currently available.

8.0 Flood Risk

LCC are the Lead Local Flood Authority (LLFA), as such I would refer to the LCC Flood Risk Assessment Team for comments provided under a separate response. I would expect a drainage system to be designed to provide adequate capacity following current best practice and required standards that may allow consideration of adoption if deemed appropriate by the relevant authority. I would expect these drainage matters to be a condition of any approval, if Ribble Valley Borough Council were minded to approve this application.

Note: LCC will seek to limit the use of culverts where alternative sustainable solutions can be found. No water storage would be acceptable under a public highway.

9.0 Highway Improvements (S278)

Not yet agreed.

10.0 Planning Contributions (s106)

Planning Obligation requirements are applicable to this site, forming the basis of the Highway Authority response and they are a material planning consideration. Planning contributions will be used to fund and provide for measures which support sustainable communities and developments and to reduce the level of negative impact that would

otherwise be produced by the development by providing infrastructure that facilitates/supports necessary change in travel behaviour. At this stage planning contributions are not yet agreed.

Notwithstanding no agreement on this matters, LCC do offer a Travel Plan support service and for a development of this scale in detail and outline I would require £9,000 to enable Lancashire County Councils Travel Planning Team to provide a range of Travel Plan services for the element in full and a further £6,000 for that in outline when it does come forward.

11.0 Conclusion

I do not accept the modelling results or the conclusion reached by Vectos. I am confident with the active support from Vectos that technical matters can be resolved to allow an accurate conclusion be reached. Internal layout matters will require a number of changes before they can be considered suitable.

General Additional Supporting Notes to assist Vectos

The following general comments are regarding the internal highway layout of the site for planning:-

1. Where the cul-de-sac carriageway width is reduced below 5.5m the carriageway is to vary in width between 4.5 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.5m wide. From Lancashire County Council Residential Design Guide. Where the cul-de-sac serves less than 20 properties the carriageway to vary in width between 4.1 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.1m wide. While diagram 7.1 from Manual for Streets illustrates what various carriageway widths can accommodate, they are not necessarily recommendations. The cul-de-sacs are also shared access roads where pedestrians are expected including mobility impaired and children, so alternatively provide a continuous 2m footpath for the full length of the cul-de-sac.
2. The internal roads are to be designed as a self-policing 20mph road with better use of horizontal deflection, rather than vertical deflection. Typically the speed reducing features to be at a maximum of 75m centres.
3. The minimum internal single garage size to be 6x3m and this includes integral garages.
4. The Joint Lancashire Structure Plan "Car Parking Standards" page 5 recommends the minimum internal dimension for all single garages to be a minimum of 6x3m and page 17 clause F.4.3 states "Individual garages, of minimum dimensions of 6x3m, count as one parking space. The Joint Lancashire Structure Plan "SPG access and parking" page 29 also states for residential parking "A garage is counted as one parking space. Where constructed garages should have minimum dimensions of 6 x 3 metres". Where garages are smaller than the recommended minimum internal dimension of 6 x 3m they should not be counted as a parking space and the applicant should provide an additional parking space for each garage affected.
8. A 6m manoeuvring space is recommended from all private drives onto the adoptable highway, to ensure vehicles are not overhanging the opposite footpath or causing damage to other vehicles and property, alternatively widen the parking bays to 3.2m to allow turning within the bay.
10. The off-road footpaths to be a minimum of 3m wide (best practice now indicates 3.5m) shared surface cycle paths to aid social inclusion and the promotion of sustainable forms of transport. Barriers are required to slow cyclist where the off-road cycle routes join the main highway.

11. The private drives to have a minimum width of 3.2m where they are used for vehicular access and pedestrian access to the property. From Approved Document M (Access to and use of buildings). Clause 6.15-b and 6.17-a require flights with unobstructed widths of at least 900mm.

12. Under part M of the Approved Documents a level access is required into new properties and generally a mobility ramp is associated with the level access. Ensure the mobility ramp and level access does not encroach into the manoeuvring area for the parking bays, the parking bays, the existing adopted highway or the new adoptable highway.

13. Where the private drives are sandwiched between walls and fences, it is recommended that the drives are to have a minimum clear width of 3.0m, to provide additional room to open the doors. The recommended width of 3m is based on the width of a large family car (Ford Mondeo Estate 2.09m wide), clearance at the passenger side to the garage (200mm), clearance at the drive side of the car and the garage (700mm), with room to open car door for less able bodied.

14. Where any paired parking bays are adjacent to walls and fences, it is recommended that the drives have a minimum clear width of 2.6m, to provide additional room to open the doors.

15. I recommend the local planning authority attaches a planning condition requiring an agreement between the applicant and the local highway authority under Section 38 of the Highways Act 1980 or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes

Reason: - To ensure that the estate streets serving the development are completed and thereafter maintained to an acceptable standard in the interest of residential / highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the development; and to safeguard the visual amenities of the locality and users of the highway.

Yours sincerely



Neil Stevens
Highways Development Control Manager