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30th October 2019

Your Ref: 3/2019/0666 Our Ref: MHC/1954

Adam Birkett Senior Planning Officer Planning Department Ribble Valley Borough Council Simon Hardie Development Support Officer Highways and Transport Lancashire County Council

Dear Sirs,

Planning Application Ref: 3/2019/0666 Outline application on Land south of Lower Road (B6243) - on land east of Higher College Farm – B1 units

We have been asked by the Applicant to prepare a letter responding to the comments made by Lancashire County Council with respect to highway related matters and in particular with regards to the access.

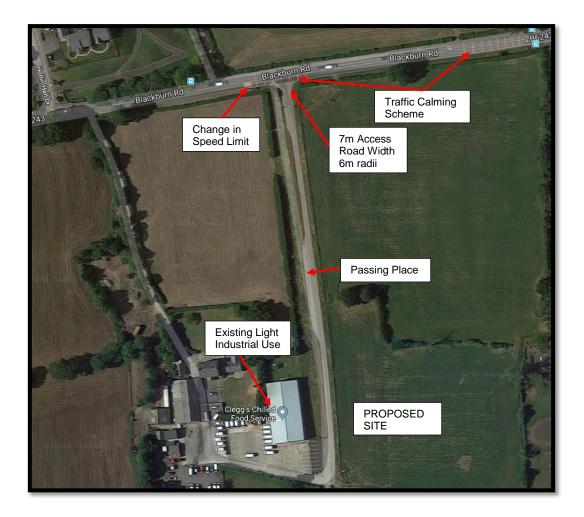
It is noted that the Applicant has removed the proposed B8 land use from the Planning Application and that the proposal is now for B1 Light Industrial land use.

Existing Situation

The existing access road, where it meets Blackburn Road is 7m in width (at the back of the bellmouth) with 6m radii kerbs. The access road remains at 7m for about a 25m distance back from the access stopline, where the access road narrows to just under 5m. There is a passing place approximately half way along its length to the access with the existing Clegg Chilled Food development.

The speed limit changes to 30mph just to the west of the access, which results

in the traffic calming scheme just prior to the speed limit change sign being located across the access road junction. The access Road just falls within the 60mph speed limit on Blackburn Road, with Blackburn Road at this point being 7.8m in width. Below is an extract from Google Maps which indicates the access road layout and shows the change in speed limit and traffic calming scheme.



In addition to the above, the northern side of Blackburn Road has a footway, is lit with street lighting and has bus stops located to the east and west of the access.

An investigation of local traffic accident data using Lancashire County Council's Mario Mapping service indicates that the nearest accidents on Blackburn Road occurred to the west approximately 135m away and to the east approximately 170m away. There have therefore been no accidents recorded associated with the existing access or within its immediate vicinity. It can therefore be considered that the current use of the access by the existing development is

being carried out safely and has no adverse impact on existing highway safety.

In recent years, the fields either side of the access have received Planning Permission with their own proposed accesses onto Blackburn Road. To the east was a proposed Business/Industrial Park and to the west a B1, B2 and B8 Business Park aimed at starter units. Neither have yet been built, however as both have received Planning Permission it is must be considered that their impact on the local highway network would not have been severe and therefore safe to all highway users.

Both permitted developments included speed survey information. Based on these surveys, it has already been agreed with Lancashire County Council Highways that for this development as 2.4m x 120m visibility splay would suitable. The visibility splay drawing is attached which indicates that this is achievable.

The main vehicular user of the existing access is Cleggs Chilled Food Service. It is estimated that they have in the region of 25 sprinter type chilled vans. It is understood that they generate trips throughout the day, however the bulk of their trips are in the morning when they deliver to shops and restaurants etc.

In addition it is understood that Cleggs also have some deliveries made by HGV's, especially during the early morning period. It is understood that most of the chiller vans are used each day and often make multiple trips between their depot and customers. It is therefore considered that a conservative estimate on trips generated by Cleggs would be in the region of 80 trips per day (2-Way).

As indicated by the local accident record, the trips generated by Cleggs, which include HGV trips, are being made safely with negligible impact on the local highway network.

National Planning Policy Framework (NPPF), July 2018

The NPPF sets out the Government's Planning Policies for England and how these are expected to be applied. One of the core objectives is to encourage sustainable growth and achieve economic growth through the Planning System. The NPPF states that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

It is clear that the current access, which includes HGV and LGV traffic, as indicated earlier is operating safely, and therefore currently has an acceptable impact on highway safety. In addition, with the proposed developments being permitted either side of the existing access, both with new proposed access points onto Blackburn Road, that these residual cumulative impacts on the local road network are therefore not considered severe as Planning Permission was granted.

Proposed Development

The proposal is to provide 3 Light Industrial units (B1) on the opposite side of the access road to Cleggs Chilled Foods. The proposed development will use the existing access road, with no changes proposed at the access point to Blackburn Road.

The 3 units have a combined Gross Floor Area (GFA) of 792 Sqm, with associated parking and turnaround areas. A copy of the proposed site layout is attached. Note the site layout plan indicates B1/B8 land usage, this is incorrect and should only state B1 land use.

The approved development proposal located to the east of the access included an element of Industrial use. The accompanying Transport Statement indicated the following trip rates, based on information in the TRICS land use database for an industrial estate. These trip rates have presumably been approved by LCC and are therefore considered appropriate for this location.

	Morning Peak 08.00 – 09.00			Evening Peak 17.00 – 18.00		
	Arrive	Depart	Total	Arrive	Depart	Total
Trip Rate	0.466	0.259	0.725	0.121	0.379	0.500

Table 1: Proposed Development Trip Rates and Traffic Generations

Trips Generated 4 2 6 1 3 4

Note: Trip rates based on 100Sqm GFA, and taken from TA Report prepared by PSA Design for Land off Blackburn Road, Longridge, dated June 2017.

The above trip rates indicate that there will potentially 6 trips generated 2-Way during the morning peak period and 4 trips generated 2-Way during the evening peak period. This level of increased traffic will not have a material impact on the operation of the access road and not on the operation of the local highway network.

Deliveries – HGV Usage

The size of the units are such that they will be desirable to start up companies. Light industrial units are therefore not likely to attract HGV traffic with the all the generated traffic typically being either cars or LGV's.

It is understood that as part of the land owners Lease to the unit tenants that they will not be permitted to have deliveries made by HGV's.

A concern has been raised by Lancashire County Council Highways that deliveries may be made by HGV's, especially by the likes of TNT or Parcel Force. Enquiries have been made with TNT, Parcel Force and Royal Mail and they advise that deliveries to light industrial units such as these would not be made with HGV's. All of their rounds to this area for delivery and collection rely solely on the use of the following vehicles - Caddy van, Sprinter, 5te or maximum 7.5te Luton vans which would include pallet deliveries. No large scale vehicles deliver/collect in this or any area on a round.

Despite the above, HGV traffic is currently made to the Cleggs site. Clearly the HGV's turning maneuvers at the access are made safely as no accidents have been reported. There is sufficient visibility for both departing HGV's and arriving HGV's (forward visibility), and that other road users can clearly see if an HGV is turning.

Therefore the current usage of the access road by HGV has no severe impact on the safety of the local highway network, and clearly should the rare event occur where an HGV does access the proposed development, it is considered that this can be achieved safely and without causing a severe impact to highway safety.

Swept Path Analysis

Lancashire County Council Highways have previously requested swept path analysis. Attached are drawings indicating the swept paths for a number of vehicles including:-

P19091-001 & P19091-002 – These two drawings show four vehicles (a skip lorry, a small tipper truck, a rigid box van and a refuse vehicle), which are able to enter/ egress the private road with no overrun of the Blackburn Road centreline.

P19091-003 – This drawing shows that a small articulated vehicle and a larger refuse vehicle measuring circa 10.5m in length are able to enter/ egress the private access with no overrun of the Blackburn Road centerline.

P19091-004 – This drawing shows that a 12m rigid and an articulated HGV with a circa 12m container are both able to make the maneuver, however there is some encroachment onto the opposite side of Blackburn Road.

Note that the AutoTrack software presents a worst case scenario, therefore in reality the overrun may not be as severe as shown in these drawings.

In practice it is unlikely that an HGV driver would turn left out of the access road without Blackburn Road being clear of traffic. Clearly this is currently the case for the existing HGV drivers who use the access road.

Despite of the above, it is unlikely that an HGV vehicle would go the proposed development, especially as the land owner will discourage HGV usage.

Access Junction Geometry

It is not proposed to make any changes to the access road geometry with Blackburn Road. Based on the above information the majority of vehicles using the access by both Cleggs and the proposed development are either cars or LGV's, with the existing users being able to use the access safely. The small increase in traffic associated with the development will not have a material impact on the operation of the access junction, and will be able to use the junction safely with adequate visibility splays being achieved. The increase in traffic will therefore not have a severe impact.

The junction is already being used safely by HGV's, as demonstrated the safe accident record, and as the increase in HGV movements is unlikely/minimal, it is not considered that making changes to the access is required.

In fact making alterations to the junction may have a negative impact which would outweigh any gain in providing for any small/negligible increase in HGV movements. The concern would be that increasing the kerb radii or creating a taper and/or widening the access road further may result in the existing and proposed car/LGV users being able to make the turning movement at a faster speed. This would increase the likelihood of an accident occurring in the future and therefore would be perceived as an over design of an existing safe junction.

Construction Traffic

The Applicant is happy to agree to produce a Construction Management Plan as a Condition. This will advise on good working practices which include those associated with deliveries, delivery times, cleanliness, keeping neighbour's informed, etc. With regards large vehicle deliveries, the CMP will advise on how these will be made, including the use of signage, banksmen, highway safety and delivery times. Enquiries have been made regarding building supplies smaller suitably sized HGVs can primarily be requested/used.

Summary

The existing access is located adjacent to a 30mph speed limit change sign, and has been used safely by Cleggs Chilled Foods. Cleggs Chilled Foods currently make a number of trips a day primarily with LGV's, though it is understood that HGV deliveries are also made.

There have been no accidents reported that are associated with this junction, and therefore it is concluded that this access junction is operating safely and does not have a severe impact on highway safety, despite current HGV usage. It has been agreed with LCC that a 2.4m x 120m visibility splay is appropriate at this location and that this visibility splay is achieved.

Two other developments have been permitted either side of the existing access, both proposed with new accesses, and both incorporating an element of B1 industrial land usage. The proposed increase in traffic associated with these developments have been accepted by LCC Highways and therefore it must be considered that the cumulative impact on the local road network is not considered severe. These permitted developments will generate considerably more traffic than that proposed in the current Planning Application.

The proposed development is for three B1 light industrial units totaling 792 Sqm GFA. The proposed B8 element is no longer part of the Planning Application.

The proposed development is likely to generate 6 trips 2-Way during the morning peak period and 4 trips 2-Way during the evening peak period. This is not considered a material increase in traffic and therefore the impact will be negligible.

The development is not expected to generate HGV traffic, with tenants discouraged to generate HGV's via their lease agreement. It is also understood from TNT and Parcel Force that no HGV's are used to deliver/pick up locally and would not be used to light units such as these.

Swept path analysis indicates that traffic can turn safely, though HGV traffic when turning left out of the access may cross the center line on Blackburn Road. However, this is currently happening safely, and there is no reason why this should not continue to happen safely. This is not be considered a severe impact on highway safety, especially with the good visibility sightlines available.

It is considered that there is no need to make alterations to the access junction design as currently all vehicle movements occur safely. It is considered that any alterations that either increase the kerb radii, access road width or create a taper may result in vehicles being able to turn at a faster speed and therefore such an alteration would be detrimental to highway safety.

The Applicant would be happy to Condition the production of a Construction

Management Plan. Such a plan would include how occasional large vehicles would be treated especially with regard to preserving highway safety.

Conclusion

In our professional opinion, the increase in traffic associated with the proposals would not have an adverse impact on the local highway network and therefore access proposals are acceptable and safe, and therefore not a reason for refusal.

Yours Sincerely

P. J. J. Price

Petros Price MSc (Eng) BSc (Hons) MCILT DIC Director Modal Highway Consultants Ltd

Enc. Visibility Splay Drawing Site Layout Plan Swept Path Drawings

