

Cuerden Lancashire

WSP Transport Assessment Review

Client:	Brookhouse Group	Job No:	J3250954
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1.1 Introduction

- 1.1.1 This Technical Note (TN) has been prepared by Mode Transport Planning, on behalf of Brookhouse Group, following a review of the Transport Assessment (TA) undertaken by WSP for the Cuerden Strategic Site in Leyland (LCC application reference LCC/07/2022/00044)
- 1.1.2 The sections in this note are set out based on the WSP report format and provide comments and points raised following the review.

1.2 Existing Conditions

- 1.2.1 Paragraph 2.3.19 provides a description of Old school Lane, however it fails to mention that the road is only c.2.5m wide, subject to limited forward visibility in places and subject to national speed limit. All of these issues make it unsuitable for use as a pedestrian route.
- 1.2.2 Similarly, Paragraph 2.3.21 provides a description of Stoney Lane, however it fails to mention that the road is only c.2.5m wide and subject to national speed limit. These are also issues which make it unsuitable for use as a pedestrian route.
- 1.2.3 Figure 2-6 in the WSP TA shows walking isochrones from the centre of the site, however this is entirely misleading as the isochrones show the inclusion of the link road which is not part of this application. It also assumes that Old School Lane and Stoney Lane are appropriate pedestrian routes which is not correct. On this basis the only pedestrian link that should be shown is onto the A582 to the north of the site and the A49 to the east of the site which will vastly reduce the walking isochrones.
- 1.2.4 Paragraph 2.4.5 states *“A582 adjacent to site a footway is present on the northern side of the A582 to the A6 and to retail and leisure facilities east of the A6”* this fails to acknowledge the lack of suitable crossing facilities along the A582, and the large diversion required for pedestrians to use the crossing facilities at the A582 / Stanifield Lane roundabout junction.
- 1.2.5 Paragraphs 2.4.6 and 2.4.7 list a number of Public Rights of Way (PRoW) in the vicinity of the site and note that these will be retained, partially diverted or upgraded as part of the development. It has however not been noted that two of the four PRoWs listed are not in land within the applicant's control and this is therefore not possible without third-party land agreements.

- 1.2.6 Figure 2-8 in the WSP report shows cycling isochrones from the centre site, however this is entirely misleading as the isochrones show the inclusion of the link road which is not part of this application.
- 1.2.7 Paragraph 2.5.1 and Table 2-1 provides a summary of the bus services available from Stanifield Lane, but there is no review as to whether the bus stops are within recommended walking distances.
- 1.2.8 Paragraph 2.5.3 and Table 2-2 states that Lostock Hall Railway Station is located 700m to the north of the site and provides a summary of services from the station.
- 1.2.9 **Figure 1.1** shows the walking routes within the site within 400m of a bus stop and 800m of the railway station.

Figure 1.1 : Walking Routes



- 1.2.10 The plan shows that only a small area of the residential site is located within 800m of the railway station whilst much of Zone A is not within walking distance of a bus stop or the railway station.

- 1.2.11 The few areas within Zone A which are within walking distance of a bus stop are reliant on routes within the residential site to provide direct links, however there is no guarantee that these will be provided first to ensure that this area is considered to be sustainable development in accordance with the National Planning Policy Framework (NPPF).
- 1.2.12 Table 2-4 shows the local facilities which primarily includes those which are included in the outline planning application and there is no guarantee that these will be provided. The remaining amenities are subject to at least a 25-minute walk.

1.3 Proposed Development

- 1.3.1 The proposed Stanifield Lane residential access, shown in Drawing 84465-WSP-XX- DR-003, has been co-ordinated with the proposed Lancashire County Cricket Club (LCCC) scheme access location. This requires widening within the LCCC land, which is not included within the Cuerden Strategic Site red line boundary.
- 1.3.2 Paragraph 3.3.1 states *“If the Farington proposals were not build out, the junction layout would be proposed as a three-arm priority junction.”* However, it has not been demonstrated that this access can be delivered independently of the LCCC scheme and within the red line boundary.
- 1.3.3 Paragraph 3.4.2 states *“The southern arm leads on to a second internal roundabout, which is proposed as a 4-arm priority roundabout, with access to Zone A units on the western arm, access to Future Phase zone and Zone D development land to the south, and remaining Zone A units, and Zone B units to the east”*. This is incorrect as the masterplan shows that a ransom strip has been left between the roundabout and the Future Phase Zone which will potentially prevent further development.
- 1.3.4 Paragraph 3.4.3 states *“Upon completion of full build out a route between the M65 terminus and Stanifield Lane will be available using the internal highway layout”*. This is not the case as the link road is not included in this application and requires third-party land to be delivered.
- 1.3.5 Paragraph 3.5.1 states *“The internal layout of the site will provide suitable pedestrian and cycle routes between the various proposed uses and will enable active travel users to travel across and within the site safely and conveniently. Internal footways will provide access to each of the individual development plots and units, as well as connecting between the development plots”*. This is incorrect, without the link road, Zone D is now a standalone development which is not connected to the remainder of the development and is now beyond walking distance of the proposed amenities.

1.3.6 Paragraph 3.6.1 states *“Public transport services are available in close proximity to the site, as highlighted in Chapter 2. At this stage it is not proposed to divert bus services via the site itself, but the flexibility to do this in the future is maintained through highway design which will allow the passage of public buses if required”*. As demonstrated in Figure 1.1 of this note, most of the site is not considered to be within reasonable walking distance of a bus stop or a railway station. Additionally, without the link road there is no flexibility to allow the passage of buses in the future without the use of third-party land.

1.4 Policy Review

1.4.1 Paragraph 4.2.1 states *“The latest version of the National Planning Policy Framework (NPPF) was published in July 2021. The Framework identifies that the purpose of the planning system is to contribute towards sustainable development. It maintains that plans and decisions should apply a presumption in favour of sustainable development”*. It has been demonstrated that this is not considered to be a sustainable development.

1.4.2 Paragraph 4.2.6 states *“Chapter 3 outlines the site access proposals, which have been designed to provide safe and suitable access to all users”*. It has not been demonstrated that the residential access can be delivered within the red line boundary. Pedestrian access is only available on to the A582 to the north and A49 to the east for Zone A. There are no proposals to improve cycle access to the site.

1.4.3 When referencing the DfT Circular 02/2013 in the WSP TA paragraph 4.2.11 states *“paragraph 26 states that ‘The Highways Agency expects the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites’”*. It has been demonstrated that the site is not accessible and therefore it does not conform with this policy.

1.4.4 When referring to the Lancashire County Council (LCC) Local Transport Plan (2011-2021) the WSP TA states *“The development proposals will provide a local leisure facility, accessible via existing walking and cycling infrastructure, and via sustainable transport modes. The proposed development can be delivered in accordance with the aims and objectives outlined in the Local Transport Plan”*. It has been demonstrated that the site is not sustainable and therefore it does not conform with this policy.

1.4.5 When referring to the Central Lancashire Core Strategy (2012) the WSP TA states *“The proposals will promote sustainable modes to travel to and from the site and will bring a new sport and recreation facility that will welcome and encourage community uses”*. It has been demonstrated that the site is not accessible by sustainable modes and there are no proposals to promote sustainable modes therefore it does not conform with this policy.

- 1.4.6 When referring to the South Ribble Council (SRBC) Local Plan (2015) the WSP TA states *“It is clear from Policy C4, that development of the site is supported within the Local plan, and that infrastructure plays a critical part in the development. This TA outlines the proposed Masterplan for the site which includes employment opportunities as well as supporting land uses”*. This policy requires the “comprehensive development of the site” which is not achieved as part of these proposals as a large area of the strategic site has been removed from the planning application and ransom strips have been included which could prevent the delivery of the allocated site.
- 1.4.7 The inclusion of ransom strips is also something that should not be acceptable within any allocated development site as a matter of principle.
- 1.4.8 Furthermore, the policy states that planning permission will be agreed subject to *“an agreed masterplan”*, this cannot be met as the application has been submitted to LCC and will not be approved by SRBC.
- 1.4.9 It can therefore be concluded that the proposals are not compliant with this policy.
- 1.4.10 Paragraph 4.5.1 states *“In summary, the proposed development is located in a sustainable and accessible location and accords with the principles of national, regional and local planning policy”*. It has been demonstrated that the site is not in a sustainable and accessible location and therefore the proposals do not conform with national, regional or local planning policy.

1.5 Trip Distribution and Generation

- 1.5.1 New trip rates have been obtained, including for the B2/B8 Uses, which are lower than the original trip rates in the Mott MacDonald (MM) TA (dated 20th January 2017), prepared for the previous (IKEA) application (SRBC reference 07/2017/0211/ORM).
- 1.5.2 WSP have sought to show a reduction in trips across the peak hours due to the loss of the retail element; however, much of the reduction is down to the change in trip rates which has not been justified. [Table 1.1](#) provides a summary of the AM and PM peak hour trips for the current proposed scheme based on WSP’s new trip rates and the original trip rates which were approved by LCC Highways.

Table 1.1 : Trip Generation Comparison – WSP Trip Rates vs Approved MM Trip Rates

Land Use	AM Peak Hour			PM Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	Total
Proposed as per WSP TA	941	371	1312	569	942	1512
Approved MM Trip Rates	1103	587	1699	725	1095	1822
Difference	+162	+216	+387	+156	+153	+310

1.5.3 It is evident that WSP have sought to reduce the development impact from changing the previously approved trip rates, rather than just the remove the trips associated with the large retail unit. It should be noted that there is no confirmation in WSP’s TA that the new trip rates have been agreed with LCC Highways and/ or National Highways as the scoping response is not attached.

1.5.4 If the approved employment trip rates were applied to the current development proposals, the AM peak hour trip generation would be higher than that generated by the approved development scheme. The PM peak trip generation would be lower, based on the removal of the large retail unit. A trip generation comparison is shown in [Table 1.2](#).

Table 1.2 : Trip Generation Comparison – Approved Development vs Current Scheme using Approved Trip Rates

Land Use	AM Peak Hour			PM Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	Total
Previously Approved MM TA	1094	397	1491	731	1267	1998
Proposed Scheme using Approved Trip Rates	1103	587	1699	725	1095	1822
Difference	+9	+190	+208	-6	-172	-176

1.5.5 As demonstrated in [Table 1.2](#), if the approved employment trip rates were applied by WSP in their TA, the current proposed development scheme would generate higher AM peak hour trips on the road network; therefore, the conclusion by WSP that there is a reduced impact from the proposed development scheme is incorrect.

- 1.5.6 Furthermore, Zone D employment trips continue to benefit from a 10% reduction in linked trips to the retail and leisure elements of the site. This is despite the fact there is no vehicular or pedestrian connection between these areas of the site and the trips would need to route via the local highway network.
- 1.5.7 Baseline traffic data from 2016 has been used in the assessments which is considered too old to be used for the application. Paragraph 5.3.2 states *“Following a review of recent applications in the local area and their corresponding Transport Assessments, the traffic flows from the previous planning application for the Cuerden Strategic mixed-use site (South Ribble Planning Reference 07/2017/0211/ORM) were identified as suitable for use within our traffic assessment”*. No analysis has been provided in the TA to demonstrate that the flows are suitable.
- 1.5.8 WSP state that they have used TEMPRO Growth factors to uplift background traffic growth from the 2016 counts to the 2032 and 2037 future years; however, the growth rates applied to the 2032 growth is the same as the growth rate applied by MM for the 2024 growth. This is despite there being an additional 8 years included. A comparison between the growth factors used is shown in [Table 1.3](#).

Table 1.3 : Growths Factors

	AM Peak	PM Peak
MM 2016 - 2024	1.09	1.08
WSP 2016 - 2032	1.09	1.08
WSP 2016 - 2037	1.13	1.12

- 1.5.9 The proposed LCCC facility has been included as a committed development, although the trip generation for this, which was also undertaken by WSP, is disputed.

1.6 Active Travel and Sustainable Transport

- 1.6.1 Paragraph 6.1.1 states *“As set out in Chapter 2 of the TA, the Site is well located for sustainable travel to a number of local destinations using either active travel modes or public transport. The development will enhance these opportunities further, in particular through the provision of a high-quality foot and cycle network within the site and key connections off the Site”*. In its current form the site is not well located to support sustainable travel without the diversion of bus routes into the site although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.

- 1.6.2 Paragraph 6.2.1 states *“The existing pedestrian and cycling infrastructure surrounding the Site and the local area can facilitate active travel trips to/from the site. Walking and cycling isochrones provided in Figures 2-6 and 2-8 show local areas within a 25-minute walk or 20-minute cycle of the site”*. Pedestrian and cycle connections into the site are limited from the existing infrastructure surrounding the site. The isochrones are based on non-existent or unsuitable infrastructure.
- 1.6.3 Paragraph 6.2.2 states *“The internal layout of the site will provide suitable pedestrian and cycle routes between the various proposed uses and will enable active travel users to travel across and within the site safely and conveniently. Internal footways will provide access to each of the individual development plots and units, as well as connecting between the development plots”*. Zone D is a standalone development plot which does not connect to the rest of the development.
- 1.6.4 Drawing MMD-370964-C-DR-00-XX-0002 shows the proposed cycle infrastructure improvements on Stanifield Lane, however this has not been updated to align with the updated access proposals and therefore does not relate to the current application.
- 1.6.5 Cycle access from Zone A to the south is now exclusively via Stanifield Lane without the link road, but no improvements above the previous proposals are included. This also now includes cyclists turning at the priority junction with Stoney Lane rather than the proposed signal junction arrangement which is considered to be less safe.
- 1.6.6 Paragraph 6.4.2 states *“at this stage it is not proposed to divert bus services via the site itself, but the flexibility to do this in the future is maintained through highway design which will allow the passage of public buses if required”*. It has been demonstrated that most of the site is not considered to be sustainable without the diversion of bus routes into the site. There is no flexibility to divert bus services in the future based on the proposals in their current form and any future improvements would require third-party land although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.
- 1.6.7 Paragraph 6.4.3 states *“The site is within walking and cycling distance of local rail stations, Leyland and Lostock Hall. Sustainable journeys to and from the site can make use of the existing rail services from these stations”*. Only a small section of the residential site is within walking distance of Lostock Hall Railway Station whilst none of the site is within walking distance of Leyland Railway Station.

1.7 Traffic Capacity Assessments

- 1.7.1 Paragraph 7.4.2 states *“As outlined in Chapter 5, the proposed scheme generates less vehicle trips than the consented scheme, therefore provision of the same scale of mitigation as previously proposed is considered as more than appropriate for the revised development”*. This is contested, as the reduction in trips is based solely on the change to the trip rates; therefore, the mitigation measures may not be sufficient to accommodate the proposed development.

- 1.7.2 All Modelling in Chapter 7 of the WSP TA compares the proposed scheme with the MM junction modelling, which does not include the previously consented link road through the site between the M65 Terminus and Stanifield Lane. Without the inclusion of this key link road, which has been removed in the proposed development scheme, it is not a direct comparison with what was previously consented and the increase in traffic on the A582 may result in the mitigation schemes not being sufficient.
- 1.7.3 Table 1.4 shows the number of trips which would have been diverted off the A582 corridor as a result of the introduction of the link road in the consented scheme, which have not been considered in the Base + Committed Scenario in the WSP TA.

Table 1.4 : Link Road Diverted Trips

Movement	AM Peak	PM Peak
East to West Trips	263	264
West to East Trips	240	230
Two-way trips	503	494
Percentage impact on A582 Eastbound 2024 base flows	10.5%	9.8%
Percentage impact on A582 Westbound 2024 base flows	9.1%	10.2%

- 1.7.4 The Stanifield Lane / A582 junction mitigation scheme and the A582 / A6 junction mitigation scheme improve the operation of the junctions; however, the improvement scheme will not be as effective at reducing the development traffic impact as the consented scheme due to the loss of the link road which diverted traffic through the site.
- 1.7.5 The proposed mitigation schemes for the Stanifield Lane / A582 junction and the A582 / A6 junction are the same as those which were previously approved as part of the previous development. It is unclear if WSP have included these committed mitigation schemes as part of the DM modelling or if they have just included the committed flows from the previous application.
- 1.7.6 The consented scheme has been included as a committed development (although this is without considering the benefits of the link road through the site) in the do minimum modelling. This therefore reduces the difference between the do minimum and do something scenario, along with reducing the mitigation measures required from the development to ensure that there is no impact as a result of the development despite the applications being on the same site.
- 1.7.7 Furthermore, it is understood that the existing planning consent is due to expire this month prior to LCC determining the application, and therefore this should not be included as a permitted development.

1.7.8 Table 1.5 shows the maximum degree of saturation across all lanes for the A582 / A6 signalised roundabout junction in the PM peak, as this is the only comparable data available across all scenarios from the MM TA.

Table 1.5 : Modelling Comparison

Scenario	PM Peak
A582 / A6 Junction	
MM 2024 Base + Committed	99%
MM2024 Base + Committed + Development (without mitigation)	102%
MM 2024 Base + Committed + Development (with mitigation & without link road)	101.6%
MM 2024 Base + Committed + Development (with mitigation & link road)	91.4%

1.7.9 Table 1.5 shows that the MM TA analysis demonstrated that the proposed junction mitigation measures alone were not sufficient to mitigate the development impact on the local highway network, without the introduction of the link road through the site.

1.7.10 A comparable assessment cannot be made with the WSP assessment due to the modelling scenarios that have been provided within the TA. With the increased trip generation set out previously and potential increase TEMPRO growth factors once reviewed, it is unlikely that the modelling would demonstrate that the mitigation measures alone will be sufficient to mitigate the development impact.

1.7.11 The residential site access junction has not been assessed as a standalone junction without the proposed LCCC site access.

1.7.12 VISSIM modelling has been undertaken, although as with the other modelling, the approved scheme and junction improvements have been included as committed development and it relies on the assumed reduction in trips from the reduced trip rates to show improvement to the network.

1.7.13 National Highways requested merge / diverge assessments in their scoping response which have not been provided.

1.7.14 Due to the scale of the proposed development, the previously approved application provided timescales for the delivery of all proposed infrastructure and off-site junction mitigation works.

1.7.15 Analysis and commentary have not been provided to understand when the mitigation measures are required and when they will be provided.

1.8 WSP Summary

- 1.8.1 Paragraph 8.1.3 states “*The development proposals accord with the national, regional and local transport policy of promoting sustainable development and facilitating means of travel by sustainable modes*”. It has been demonstrated in this response that the site is not considered to be accessible by sustainable modes of travel and therefore does not comply with national, regional or local policy although it has the potential to be well located to support sustainable travel if development was undertaken comprehensively.
- 1.8.2 Paragraph 8.1.4 states “*The site is proposed to be accessed via four vehicle access junctions including the revision of the existing M65 terminus roundabout, a signalised junction off Wigan Road, a signalised junction off Stanifield Lane and a priority junction providing access to a residential parcel off Stanifield Lane*”. WSP have failed to demonstrate that the access to the residential land can be delivered independently and within the proposed red line boundary.
- 1.8.3 Paragraph 8.1.6 states “*A trip generation exercise has been undertaken, comparing the trip generation associated with the proposed land uses and overall masterplan to the trip generation of the consented scheme. The results show that the proposed development generates fewer two-way vehicle trips than the consented scheme within the peak hour periods*”. The trip generation exercise has been contrived to show a reduction in trips from the previous scheme through the use of lower trip rates, not from the change to the proposed level of development.
- 1.8.4 Paragraph 8.1.7 states “*Junction capacity modelling and microsimulation modelling have also been undertaken to assess the impact of the proposed development on the local highway network and compare the impact of the proposed development to the impact of the consented development. The results show that overall, the proposed development will have a reduced impact on the local highway network compared to the consented scheme*”. The junction capacity modelling has been based on the unsound trip generation assessment and an incorrect base scenario which makes no account for the previously approved link road.
- 1.8.5 Paragraph 8.1.8 states “*Overall, the impact of the proposed development on the local highway network is less than the previously consented development on the site*”. This is based on a disputed assessment and cannot be concluded based on the modelling scenarios which were undertaken.
- 1.8.6 Paragraph 8.1.10 states “*As a result of the above assessment and conclusions, it has been demonstrated that the residual cumulative impacts of development are not severe and there are no overriding reasons to preclude LCC from recognising that the proposals are acceptable in transport terms*”. The impact of the development cannot be concluded based on the modelling scenarios which were undertaken.

1.9 Conclusion

- 1.9.1 WSP have failed to demonstrate that the entire site is accessible by sustainable modes, nor have they proposed suitable improvements to the accessibility of the site.
- 1.9.2 Zone D has become an independent development site and does not benefit from the proposed amenities within Zone A making the area more reliant on vehicular access.
- 1.9.3 WSP have failed to demonstrate that access can safely be delivered to the residential plot of land for a standalone junction within the red line boundary.
- 1.9.4 WSP have included data within their TA which does not reflect the proposed scheme, including infrastructure improvements based on the previous scheme and isochrones based on infrastructure that is not proposed.
- 1.9.5 The inclusion of ransom strips to the future development phase prevents comprehensive development of the allocated site. Submission of the application to LCC rather than SRBC prevents the masterplan for the allocated site from being agreed. These points are contrary to Policy C4 of the SRBC Local Plan 2015.
- 1.9.6 WSP have contrived to show a reduction in trips from the approved application through the use of lower trip rates rather than the change to development quantum.
- 1.9.7 The DM modelling scenarios fail to consider the approved link road and associated reduction in traffic on the A582 resulting in an incorrect comparison with the DS scenario. Therefore, based on the modelling undertaken it cannot be concluded as to whether the impact of the development is severe and therefore in accordance with the NPPF.
- 1.9.8 In summary WSP have failed to demonstrate that the entire site is accessible by sustainable modes, that the site can be accessed safely or that the impact of the development is not severe.
- 1.9.9 Therefore, the development proposals fail to conform with Paragraphs 110, 111 and 112 of NPPF.