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Mr R Hope  
Development Management Group  
Lancashire County Council  
PO Box 100  
County Hall  
Preston  
PR1 0LD

21616/A5/PR/PN  
24 February 2023

Dear Rob,

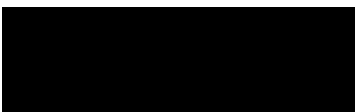
**APPLICATION REFERENCE LCC/2022/0044  
LANCASHIRE CENTRAL, CUERDEN STRATEGIC SITE, EAST OF STANIFIELD LANE, NORTH  
OF CLAYTON FARM, WEST OF WIGAN ROAD, LOSTOCK LANE, LOSTOCK HALL, LANCASHIRE**

We write in relation to the above application on behalf of Maple Grove Developments and Lancashire County Council ("the Applicants").

Following the close of the statutory period of consultation we note that responses have been received from the neighbouring landowner, Brookhouse Group Limited ("BGL"). As the submission takes the form of several letters and reports, we have prepared a table providing a line-by-line response to the issues raised. Please find this enclosed.

We trust that this clarifies our position in respect of the comments made. However, should you require any further information or clarification, please do not hesitate to contact me or Paul Newton.

Yours sincerely,



**PAUL REEVES**  
Planning Associate

Enc.

**LANCASHIRE CENTRAL  
RESPONSE TO REPRESENTATIONS MADE BY BROOKHOUSE GROUP LIMITED**

**Letter dated 30 September 2022 – Town Legal**

	Issue Raised by BGL	Applicant Response
1.	Brookhouse not notified of application submission.	There is no obligation on the Applicant to notify an adjacent landowner of the submission of the application.
2.	Incorrect Certificate issued given National Highways land.	Following submission of the application it has been brought to our attention that the applicant does not control all of the land within the redline. The application forms have been updated and Certificate C has been served.
3.	Inconsistencies with Red Line site boundary.	<p>The redline boundary of the site is as shown on the Site Location Plan (21017-FRA-XX-ZZ-DR-A-91-0001_P4).</p> <p>Whilst not material we acknowledge that there were a number of minor inconsistencies between the submitted documents.</p> <p>This primarily relates to those plans not including parts of the public highway.</p> <p>Whilst these plans do not constitute the Site Location Plan (detailed above) and are therefore only illustrative and required to sufficiently identify the location of the site, we have nonetheless updated the relevant plans so that they accord with the submitted Site Location Plan. The updated drawings are identified below and include:</p> <ul style="list-style-type: none"> <li>• ES Vol 1 Figure 1.1;</li> <li>• ES Vol 1 Figure 2.1;</li> <li>• ES Vol 1 Figure 3.1a;</li> <li>• ES Vol 1 Figure 3.1b;</li> <li>• ES Non-Technical Summary B;</li> <li>• ES Non-Technical Summary C; and</li> <li>• ES Non-Technical Summary D.</li> </ul>

		On the basis that the application documents already assess the implications of the works proposed to the public highway, these changes have no material effect.
4.	Suggestion that the "Authority Employment" section should be updated to confirm that the LCC as Applicant (or joint applicant) is linked to LCC as decision maker.	<p>The roles of LCC as applicant and decision maker are separate. Regulation 3 specifically provides for LCC to determine the application. If it wasn't determined this way, the determination could potentially be unlawful. The process is standard practice in LCC and in all other LPAs across England. The practices employed to ensure proper decision making include:</p> <ul style="list-style-type: none"> <li>○ Applications, especially where objections are received, are determined by the council's Development Control Committee and not officers.</li> <li>○ There is a clear separation of officer roles. In simple terms, officers that prepared the application are not involved in its management or determination.</li> <li>○ The determination process is the same as that used for all applications. Representations are carefully considered, advice is sought from statutory consultees, and public speaking at the committee is supported.</li> </ul>
5.	Query over Regulation 3 approach – position reserved.	Noted – no response required.
6.	Request for copies of Highway Pre-Application Advice.	<p>Neither the applicant of the local planning authority is required to provide copies of pre-application advice.</p> <p>However, Paragraphs 1.4.1-1.4.1 of the submitted Transport Assessment provides an overview of the pre-application discussions which took place between the Applicant, LCC Highways and National Highways.</p> <p>Any comments received at that stage were based on a draft and indicative scheme and as a response providing detailed comments would only serve to confuse matters.</p>
7.	Request for details of infrastructure costs.	<p>Paragraphs 4.22-4.24 of the submitted Financial Viability Assessment sets out the total cost of the strategic infrastructure. Paragraph 4.24 confirms that the total anticipated cost amounts to circa ~£59m, comprising ~£41m of works off-site and ~£18m on-site. The text goes onto explain what other assumptions have been made regarding these costs.</p> <p>Our Financial Viability Assessment presents an appropriate level of detail to reach an informed conclusion on the viability of the scheme. We do not therefore consider it necessary to provide further detail.</p>

**Letter dated 1 November 2022 – Town Legal**

Issue Raised by BGL		Applicant Response
1.	<u>Ecology</u> <ul style="list-style-type: none"> <li>- Envirotech Bat Report</li> <li>- Envirotech Bird Report</li> <li>- BNGA Calculation</li> <li>- Any Wintering Bird Surveys</li> <li>- Habitats Regulations Assessment (given site is 9.1km from SPA/Ramsar site)</li> <li>- Any Management Plans eg. CEMP or Bio-diversity Management Plan</li> </ul>	Please refer to the detailed response provided by Envirotech dated 16 January 2023 (copy attached).
2.	<u>Trees</u> <ul style="list-style-type: none"> <li>- Arboricultural Report</li> </ul>	Additional details regarding arboricultural impacts including an Arboricultural Report were submitted to LCC on 22/12/22.

**Letter dated 6 December 2022 – Town Legal****Planning Matters – Alyn Nicholls**

Issues Raised by BGL		Applicant Response
1.	Scheme does not provide comprehensive development of Site as required by Policy C4.	<p>The applicants assessment of compliance with Policy C4 is set out in the submitted Planning Statement.</p> <p>The application scheme has been guided by the approved site wide masterplan and allowances have been made within the proposed development to provide access to the neighbouring plots to enable its development. This approach is consistent with the aims of Policy C4 and the definition of "Comprehensive Development" set out within the glossary of the SRBC Local Plan:</p> <p><i>[Comprehensive Development] Reflects a strategic framework for the vision of a site's development. Individual parcels of land within a larger site may be delivered at varying times, however all development should take place in line with a wider strategic framework to avoid uncoordinated piecemeal development and ensure the proper planning of an area. Agreeing a strategic framework and vision for a site prior to any development taking place is essential. In many cases, the delivery of a comprehensive development would be achieved through an agreed masterplan for the wider site.</i></p>

		<p>This definition confirms that the piecemeal development of allocated land can be acceptable where the individual proposals help to achieve the aims of the wider masterplan.</p> <p>The Proposed Development accords with the adopted Masterplan and facilitates the delivery of a comprehensive scheme of development in the long term, pending the submission of a planning application in respect of the remaining parts of the allocated CSS (beyond the applicants control).</p>
2.	Housing and town centre uses not justified.	The justification for these uses is set out within the Planning Statement and Financial Viability Statement submitted as part of the application. As BGL have made no direct reference to these documents it is unclear which elements of the justification it does not agree with.
3.	ES flawed on basis that comprehensive redevelopment not considered as an alternative.	There is no obligation for a developer to assess other potential development sites or scenarios which may include land which is not within the Applicant's control. The key words (within the quote from the EIA Regulations as provided by BGL) are "...studied by the developer...". For the purposes of this application the developer did not study development of the wider CSS and is therefore not under an obligation under EIA Regulations to include an assessment of the CSS. This is set out in Chapter 4 of the ES which explains that it has not been necessary to consider alternative locations for development given that the nature of development proposed is consistent with that supported by Policy C4 and the CSS allocation.
4.	No evidence of linkages through to BGL land and no assurances that such access would be subject to ransom.	<p>This is not an accurate statement as the development parameters include access links between LCC and BGL land with a view to forming such a road link.</p> <p>Given that the land owned by BGL does not form part of the application, it is not possible to clearly mark this route on any document or drawing intended for formal approval, but the intended links are clearly shown on Parameter Plan 2. This drawing demonstrates that:</p> <ul style="list-style-type: none"> <li>• The intention is that access to the northern most plot of BGL land will be provided via Development Zone E, which features access to Stanifield Lane. This approach, serving both plots of land via a single point of access, is consistent with the approved Masterplan.</li> <li>• The intention is that access to the southern plot of BGL land is provided via Development Zone D. Two points of potential access are provided to the BGL land.</li> <li>• The intention is that access to the central plot of BGL land is provided via Development Zones A and D. A total of three points of access are shown.</li> </ul> <p>It is therefore evident from Parameter Plan 2 that a comprehensive network of access roads is being planned for and will be established into and through the site. The exact positioning</p>

		<p>of those roads through the BGL land will be confirmed should they progress their own applications.</p>
<p>5.</p>	<p>Irregular shape of Development Plots compromise the scale of employment buildings which can be provided.</p>	<p>The position and shape of the Development Plots are appropriate.</p> <p>The Illustrative Development Framework Plan was produced to inform the design and to establish the most appropriate position for the access points, access roads, and Strategic Green Infrastructure.</p> <p>The layout of the Illustrative Development Framework Plan was informed by various consultants to achieve a balanced design, and to reflect other, non-design related considerations such as development viability.</p> <p>Whilst the final design and layout of these areas will be brought forward and assessed at Reserved Matters stage, the illustrative masterplan was designed to accommodate a realistic layout which would provide a range of appropriately sized buildings, informed by current market indicators.</p> <p>Permission is being sought for the same scale of development (on the land within the applicants' control) as the previously permitted scheme. As a result, the scale of the proposal and individual uses is not compromised. Also see below in response to point 8.</p>
<p>6.</p>	<p>Illustrative masterplan layout is unfeasible due to site topography (Plot D).</p>	<p>In preparing the development parameters, the Applicant has had regard to the topography of the existing site and, crucially, the extent to which the site levels could reasonably be altered.</p> <p>The Applicant does not agree with the assertions, as the assumptions made with respect to site levels for Zone D are consistent with the existing topography which has been surveyed in detail.</p>
<p>7.</p>	<p>Ability to provide link from Stanifield Lane to M65 Terminus roundabout prejudiced.</p>	<p>As above (response to point 4) this is incorrect.</p> <p>Whilst no direct link is provided as part of the current planning application (due to the existing land ownership position), Parameter Plan 2 demonstrates the ability to create a link from Stanifield Lane through to the M65 Terminus roundabout.</p> <p>This necessarily requires use of the BGL land which is obviously not within the applicants control. Such a position would however be consistent with the access strategy established via the adopted 2015 Masterplan and BGL would need to adhere to this should they seek the development of their land parcels.</p>

<p>8.</p>	<p>Adopted piecemeal approach substantially under delivers the potential development on site.</p>	<p>This is incorrect and misleading.</p> <p>The floorspace proposed within the applicants control is consistent with that proposed under the previous planning permission.</p> <p>In addition the submitted Economic Benefits Statement prepared in support of the application assesses the potential benefits that would be delivered from the application scheme in isolation but also should the BGL land come forward for development. It concludes that the scale of potential economic benefits would be comparable to those envisaged as part of the previous planning permission.</p> <p>It should of course be noted that, the previously permitted scheme was not delivered and as a result no economic benefits were forthcoming. The applicant is confident the submitted scheme is viable and deliverable and as a result the benefits quoted will come forward. Clearly, these could be maximised across the Site should BGL bring forward their landholding for development.</p>
<p>9.</p>	<p>Strategic green infrastructure design is flawed as it does not provide a comprehensive approach across the CSS.</p>	<p>As above, Policy C4 allows the phased development of CSS provided it accords with the approved Masterplan.</p> <p>The strategic green infrastructure proposed on the land within the applicants control is consistent with the Masterplan. This responds to existing landscaping features present at the edges of each parcel of land and aims to retain (and enhance) existing trees and hedgerows where possible. Whilst this approach may restrict the locations in which new access points can be provided (ie between such landscaping features, or where minimal impact is incurred) we believe an appropriate balance has been struck between the two.</p>
<p>10.</p>	<p>Piecemeal approach will increase pressure to release Green Belt land elsewhere.</p>	<p>This is incorrect and misleading.</p> <p>The Application Site (and indeed much of the allocated CSS) has been allocated for development in successive development plans but has not come forward for development. Neither Policy C4, nor the adopted Masterplan, prescribe a set amount of floorspace to be achieved within the CSS. Should BGL bring forward development proposals on their land parcels (as demonstrated above) there would be no reduction in the quantum of development delivered or the benefits.</p> <p>In any event, the recently published Central Lancashire Local Plan Preferred Options – Part One consultation, provides an update regarding the spatial strategy for the area. It notes that all three authorities, including SRBC, are considered to have “ample” employment land to meet needs.</p>

		As a result, there is no evidence to suggest that the development proposals would result in underdevelopment of the Application Site, nor that there are any wider land-supply constraints which might suggest that a minimum quantum of development must be achieved in order to safeguard Green Belt land.
11.	Viability Assessment is not transparent - unclear how the £59.6 infrastructure cost has been calculated.	As outlined above, we believe the Viability Assessment provides sufficient explanation as to what assumptions and estimates have been made to reach the figures quoted and to enable the Viability Statement to reach an informed conclusion. We do not, therefore, consider it necessary to provide further detail.
12.	Economic Benefits Statement should be based on Maximum Parameters rather than the illustrative masterplan.	The submitted Economic Benefits Statement clearly states and explains that the economic benefits of the scheme have been based on the Parameter Plans rather than the illustrative masterplan.  BGL comments are therefore incorrect.

### Highway Matters – Mode Transport Planning

Issues Raised by BGL		Applicant Response
1.	A range of technical points regarding the scope of assessment.	Please refer to the detailed response provided by WSP dated 16 January 2023 (copy attached at <b>Appendix 1</b> ).

### Ecological Matters – Ecus Ltd

Issues Raised by BGL		Applicant Response
1.	Envirotech Bat Report 'missing'	Please refer to the detailed response provided by Envirotech dated 16 January 2023 (copy attached).  Additional information following surveys for bats and birds has been submitted as part of the application. This includes the use of static bat detectors and further bat transect surveys. See Envirotech Letter dated 7 November 2022.
2.	Envirotech Bird Report 'missing'	Please refer to the detailed response provided by Envirotech dated 16 January 2023 (copy attached).



3.	BNGA Calculation 'missing'	<p>Please refer to the detailed response provided by Envirotech dated 16 January 2023 (copy attached).</p> <p>The fully Biodiversity Net Gain calculation was submitted as part of the application but was not made available for public viewing as it was submitted as an Excel Spreadsheet. To address this point a PDF version of the file was submitted on 22 December 2022.</p>
4.	Need for management plans eg. CEMP or Bio-diversity Management Plan.	<p>Please refer to the detailed response provided by Envirotech dated 16 January 2023 (copy attached).</p> <p>Given the current nature of the application, which is largely in outline form, no CEMP or BEMP has been provided to manage the impacts of invasive species, although it is envisaged that such documents would be required secured via planning condition (1) prior to commencement of the detailed elements of development, and (2) provided in respect of any other detailed phases of development which may come forward at the Reserved Matters stage.</p>

**Barton Willmore now Stantec**

**APPENDIX 1**  
**WSP RESPONSE ON HIGHWAY MATTERS**

## Introduction

WSP produced a Transport Assessment (TA) to accompany a planning application for the Lancashire Central development proposed on part of the wider Cuerden Strategic Site (Planning Ref: LCC/2022/0044).

Comments have been submitted by Mode Transport Planning on behalf of Brookhouse Group Limited, in a note titled ‘Cuerden Lancashire: WSP Transport Assessment Review’ dated the 5th of December 2022.

The comments within the Mode Transport Planning note have been summarised in the table below, with reference to the relevant paragraph numbers noted. Repeated comments have been grouped together to avoid repetition of responses to comments. Responses to these comments are provided, giving further clarification and relevant additional information on the comments raised by Brookhouse Group Limited.

Brookhouse Group Limited Comments	Response to Comments
<b>Existing Conditions (Section 1.2)</b>	
Old School Lane unsuitable pedestrian route due to width, forward visibility and speed limit (1.2.1)	Parameter Plans 2 (Highways and Access) produced by Fletcher Rae which accompany the planning application show the proposed walking and cycling movements within the site. A new PRoW is proposed to run parallel to Old School Lane, connecting the A582 Lostock Lane to Stoney Lane and the existing PRoW which runs east-west along the southern edge of Zone A. WSP Drawing <i>84465-WSP-XX-DR-011 P02</i> shows that the proposed internal highway layout includes footways on both sides of the carriageway providing an additional north-south route. Multiple alternatives to Old School Lane are provided for this North-South movement and pedestrian permeability is promoted within the site.
Stoney Lane unsuitable pedestrian route due to width and speed limit (1.2.2)	Parameter Plan 2 (Highways and Access) shows the pedestrian link between Zone A and the proposed residential area – this is considered to be the main pedestrian route to/from the development from/to Stanifield Lane. The layout of the residential area will prioritise pedestrian movements and promote a clear pedestrian access point. This route will link onto Stanifield Lane close to the bus stops and the pedestrian crossing as shown on drawing <i>MMD-370964-C-DR-00-XX-0002</i> . Therefore, pedestrian permeability through the site will be prioritised and provide a suitable alternative route to Stoney Lane.



<p>Walking Isochrones uses inappropriate pedestrian routes (1.2.3)</p>	<p>The walking isochrones map includes the PRoW which is proposed to connect the A582 with the internal footway provision adjacent to the internal carriageway and is therefore not reliant on the use of Old School Lane. It also includes the existing PRoW which connects to Stoney Lane. The footway provision on-site connects to existing footway provision and therefore the walking isochrone map presented in the TA remains appropriate.</p>
<p>Lack of Suitable crossing facilities along the A582 (1.2.4).</p>	<p>The proposed off-site mitigation includes a signalised crossing on the A582 to the east of its junction with Old School Lane. This provides a more direct route to/from the site than crossing at A582 / Stanifield Lane roundabout and corresponds with the likely pedestrian desire line in this direction linking to the pedestrian provision on-site. See drawing MMD-370964-C-DR-XX-0016 in Appendix I of TA for further information.</p>
<p>Two of the four PRoW listed are not in land within the applicants control and therefore changes to these are not possible without third party land agreements. (1.2.5)</p>	<p>Parameter Plan 2 (Highways and Access) shows the proposed changes to the PRoWs associated with the development. The plan shows the existing PRoW which are unaffected, those which will be diverted/stopped up and new proposed PRoW within the site. The changes proposed are all within the red line boundary of the Lancashire Central site. PRoWs outside of the red line boundary are unaffected.</p>
<p>No review as to whether the bus stops are within recommended walking distances (1.2.7). Parts of the site are not within walking distance to bus route or rail (1.2.10-1.2.11 / 1.6.7) and many local amenities are subject to at least a 25-minute walk (1.2.12).</p>	<p>The bus stops are located on Stanifield Lane, and as shown on Figure 1.1 of the Mode Transport Planning note, the residential development and the main mixed-uses in Zone A will be within 400m walking distance of the bus stops. Pedestrian access to these bus stops will be prioritised within the finalised layout of the site and proposed pedestrian crossing points will facilitate crossings to northbound bus stops.</p> <p>As noted within the TA, the internal highway layout has been designed to be suitable for bus movements if future demand for re-routing buses into the site becomes a preferred option.</p> <p>There are a number of local amenities proposed on the site which will encourage internal trips via foot, and pedestrian routing to off-site facilities is improved via the addition of pedestrian crossings on the A582 and Stanifield Lane.</p>
<p style="text-align: center;"><b>Proposed Development (Section 1.3)</b></p>	

<p>Stanifield Lane 4-arm residential access requires widening within the Lancashire Cricket land, which is not included within Cuerden Strategic Site red line boundary (1.3.1). For the 3-arm layout, it has not been demonstrated that this access can be delivered independently of LCCC scheme and within the red line boundary. (1.3.2)</p>	<p>The 4-arm layout will be brought forward if Farington Cricket development is approved. The 4-arm site access has been reviewed by the Highway Authority as part of the planning applications for both Farington Cricket and Lancashire Central.</p> <p>The 'WSP_LCC_Lancashire Central Drawing review' technical note (issued to LCC on 10/01/23) outlines the discussions between LCC and the project team regarding this site access junction. The note includes a revised drawing of <i>84465-WSP-XX-DR-003: Stanifield Lane Access Junction to Residential Phase Illustrative only</i> which is the current proposed layout for this access junction. The current layout is illustrative only and details will be discussed further at reserved matters stage.</p> <p>The principles of the three-arm layout were presented within MMD-370964-C-DR-00-XX-0002, and if a three-arm layout would be required this would be discussed further and included within Reserved Matters application.</p>
<p>The masterplan shows that a ransom strip has been left between the roundabout and the Future Phase Zone which will potentially prevent further development (1.3.3)</p>	<p>The Proposed Development includes access onto the Future Development Zones (ie land owned by Brookhouse Group Limited) via the internal access roads.. Sufficient detail is provided both within Parameter Plan 2 (21017-FRA-XX-ZZ-DR-A-9112 Revision P16) and the Highways Layout Plan (84465-WSP-XX-DR-011 Revision P02) to demonstrate this point. Should there still be concern regarding this point we would suggest that BGL provides a plan identifying the extent of land in question.</p>
<p>Link road is not included in this application and requires third-party land to be delivered – therefore no highway link, pedestrian, cycle link or public transport link. (1.3.4 / 1.3.5 / 1.3.6 / 1.6.3 / 1.6.5 / 1.6.6)</p>	<p>The TA has been undertaken assessing the full build out of the wider Cuerden Strategic Site (CSS). The Proposed Development includes access onto the Future Development Zones (ie land owned by Brookhouse Group Limited) via the internal access roads which include pedestrian/cycle provision and have been designed to accommodate buses if the need for re-routing of bus routes needs to be accommodated.</p>
<p><b>Policy Review (Section 1.4)</b></p>	
<p>It has been demonstrated that this is not considered to be a sustainable development. (1.4.1 / 1.4.3 / 1.4.4 / 1.4.5 / 1.4.10)</p>	<p>No issues have been raised by LCC Highways or National Highways on the sustainability of the site and this was not raised as a concern with the consented application. It has been demonstrated within the TA that the site will include walking and cycling infrastructure and a range of facilities on-site which will promote internal and linked trips. Bus stops are currently located on Stanifield Lane, and pedestrian</p>

	<p>access to these will be improved as noted in the comments above. Should the demand for buses to be re-routed onto the site become apparent, further discussions with relevant stakeholders will be held. As noted above, the design of the internal highway layout included consideration for future bus routing through the site.</p>
<p>Policy C4 of SRBC Local Plan requires 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. (1.4.6 / 1.4.7)</p>	<p>Policy C4 was adopted at a time when it was anticipated that all allocated land would be subject to a single development proposal. The policy promotes the ‘comprehensive’ redevelopment of the CSS but does not set an in-principle objection against piecemeal development. Given the separate land ownership the LPA must have regard to Paragraph 82(d) of the National Planning Policy Framework which requires policies to be “flexible enough to accommodate needs not anticipated within the plan”. The current development proposals anticipate the development of the remaining allocated land and includes sufficient access to said land via access points which are broadly consistent with the adopted masterplan. By providing such points of access, the comprehensive development of the wider site can be assured.</p>
<p>Policy C4 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 (1.4.8 / 1.4.9)</p>	<p>Policy C4(a) required a masterplan to be drafted which would guide the comprehensive redevelopment of the Site. This Masterplan was drafted by AECOM on behalf of LCC and submitted to SRBC for approval. The Masterplan was subsequently adopted for Development Management Purposes by SRBC’s Planning Committee on 22 April 2015 and forms a material planning consideration in the determination of planning applications relating to the Site. The Adopted Masterplan covers the entirety of land allocated as part of the CSS and is sufficiently flexible to guide this Application without the need for an amended or replacement Masterplan to be adopted.</p>
<p><b>Trip Distribution and Generation (Section 1.5)</b></p>	
<p>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). If the previous trip rates were used the trip generation would be higher than the approved scheme (1.5.1 / 1.5.2 / 1.5.3 / 1.5.4 / 1.5.5).</p>	<p>As outlined within Table 3.1 of the WSP Lancashire Central TA, multiple new land uses are introduced in the current scheme, the mix of employment uses has changes with less office space and more industrial units / industrial warehousing and the non-food retail and Ikea use has been removed. TRICS has been used to provide trip rates for these changes in land use, and the mix of land uses has contributed to the change in total trip generation.</p> <p>It is not clear from the Mode Transport Planning note how they have calculated the trip generation for the current proposals using the approved Mott MacDonald trip rates (Table 1.1), where trip rates for the new land uses which were not present previously proposed are unavailable.</p>



	<p>The MM trip rates for B2/B8 were a combination of Industrial Units, Parcel Delivery Warehousing and Commercial Warehousing – combined to create one set of trip rates applies to B2/B8. Within the WSP Lancashire Central TA, individual trip rates have been applied to Industrial units and Industrial Warehousing to better reflect the proposed proportion of units and warehousing within the site. However, for the Future Phase land, the previous B2/B8 trip rates have been used due to no changes in the assumed land uses on these plots. The use of this mix of trip rates provides an up-to-date forecast of the traffic associated with the proposed mix of employment uses within the site.</p>
<p>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. (1.5.3)</p>	<p>In post-application discussions with NH, the trip rates used have been clarified and it has been confirmed that they agree with the trip rates used. To date, the Highway Authority have raised no objection to the trip rates used, which were presented at scoping stage within the reviewed TA scoping note.</p>
<p>Baseline traffic data from 2016 has been used in the assessments which is considered too old to be used for the application. No analysis has been provided in the TA to demonstrate that the flows are suitable. (1.5.7)</p>	<p>During the scoping of the TA LCC Highways confirmed that they had a moratorium on collating new traffic count data due to the impact of the Covid-19 pandemic on travel. LCC requested the use of pre-covid traffic surveys. Within the TA, survey data from 2016 was sourced from a previous planning application for the Cuerden Strategic Site, as agreed during scoping correspondence with the Highway Authority (30/11/21 email).</p> <p>In response to post-application comments, the 2016 surveys have been compared to more recent available data on the local network and the 2016 data has been shown to have higher peak hour traffic flows than those from 2022. The 2022 data was sourced from WebTRIS and from data provided by LCC Highways Development Control from surveys undertaken on Stanifield Lane in November 2022.</p> <p>The 2016 survey data therefore provides a robust, worst-case baseline traffic flows compared to more recent data available from 2022. As a result, the assessments included within the TA represent robust scenario traffic flows.</p>
<p>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. (1.5.8)</p>	<p>TEMPro growth rates have been derived using the methodology outlined within the MM Transport Assessment, with adjustments to background housing and employment growth applied within TEMPro when calculating growth rates to account for committed developments. This avoids double counting of traffic flows associated with committed developments. The Highway authority noted that they would ‘expect where appropriate that growth rates are revised to negate against double counting’ (30/11/21) and therefore this approach is deemed reasonable.</p>

	<p>The quantum of committed developments included within the WSP Lancashire Central TA is higher than that considered within the MM Transport Assessment, therefore the overall TEMPro growth rate which has been calculated is reduced due to the consideration of additional committed developments. As a consequence, the comparison between the MM and WSP growth rates is not a direct comparison, and the WSP growth rates remain valid.</p>
<p>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 (1.5.9)</p>	<p>The trip rates and trip generation for the LCCC facility have been agreed with LCC Highways Development Control as part of the TA scoping and post-application discussions for the Farington Cricket site. Therefore, the trip generation is agreed and considered suitable for use as committed development flows within this TA.</p>
<p><b>Active Travel and Sustainable Transport (Section 1.6)</b></p>	
<p>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 (1.6.4).</p>	<p>WSP drawing (84465-WSP-XX-DR-003) is the most up-to-date version of the proposed changes on Stanifield Lane, specifically at the proposed residential access point and this should be used to understand the current proposals. This has been reviewed by LCC and provides an illustrative layout of the residential site access junction and the proposals along Stanifield Lane in this location.</p> <p>Cycle desire lines have been catered for within the site with the proposed cycle infrastructure. This will encourage cycle users to use the on-site provision where appropriate.</p>
<p><b>Traffic Capacity Assessments (Section 1.7)</b></p>	
<p>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 (1.7.1)</p>	<p>See comments above relating to trip generation.</p>
<p>Modelling assumes link road (1.7.2 / 1.7.4 / 1.7.10) 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. (1.7.3)</p>	<p>See comments regarding link assumptions.</p>





<p>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. (1.7.5)</p>	<p>The committed mitigation schemes at these junctions and the committed flows are included within the DM modelling.</p>
<p>The consented scheme has been included as a committed development in the DM modelling (1.7.6 / 1.7.7 1.7.12)</p>	<p>It was agreed at TA scoping that the traffic flows associated with the consented scheme were to be included within the Do-Minimum scenarios as a 'committed development' (Email 30/11/21). The traffic flows associated with the proposed development replace these consented flows in the Do-Something scenarios.</p>
<p>The residential site access junction has not been assessed as a standalone junction without the proposed LCCC site access (1.7.11)</p>	<p>It has been assumed that the 4-arm layout will be required due to the progress to date with the Farington Cricket Application. If this is not the case, then the 3-arm junction can be assessed when this junction is subject to detailed planning application.</p>
<p>National Highways requested merge / diverge assessments in their scoping response which have not been provided. (1.7.13)</p>	<p>Merge Diverge assessments are to be provided in response to post-application discussions with National Highways.</p>
<p>Analysis and commentary have not been provided to understand when the mitigation measures are required and when they will be provided. (1.7.14 / 1.7.15).</p>	<p>The phasing of the mitigation will be discussed with the relevant authorities, namely LCC and National Highways as detailed plans for the development come forward.</p>
<b>WSP Summary and Conclusion (Section 1.8 and 1.9)</b>	
All points already addressed in above responses	