

Mode Objection Comments	WSP Response	Mode Response
Existing Conditions		
<p>Old School Lane unsuitable pedestrian route due to width, forward visibility and speed limit (1.2.1)</p>	<p>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 84465-WSP-XX-DR-011 P02 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.</p>	<p>Initial Comment was made to highlight the need for alternative pedestrian routes to Old school Lane, as addressed by WSP comment, subject to these being implemented.</p>
<p>Stoney Lane unsuitable pedestrian route due to width and speed limit (1.2.2)</p>	<p>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 MMD-370964-C-DR-00-XX-0002. Therefore, pedestrian permeability through the site will be prioritised and provide a suitable alternative route to Stoney Lane.</p>	<p>Initial Comment was made to highlight the need for alternative pedestrian routes to Stoney Lane, the WSP response highlights the reliance on the proposed pedestrian route, through the residential site, to provide a connection with Stanifield Lane. Given that the residential access is only subject to outline planning, there is potential that the residential development will be delivered later than the industrial land and therefore this key pedestrian link will not be in place to ensure suitable pedestrian access to the site, thereby making large areas of the site unsustainable in accessibility terms.</p>
<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>This response does not address the comments, the walking isochrones are reliant on pedestrians using Stoney Lane and the internal link road which is not included as part of the application; therefore, they are not considered to be 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>The proposed crossing on the eastbound carriageway is located in an inappropriate location due to the proximity to Todd Lane South.</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>This has been updated to exclude PRows within Brookhouse land and is now suitable.</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>This fails to adequately address the concern, the Mode plan demonstrates which areas of the site are not within walking distance of a bus stop, even with the link provided through the residential land.</p> <p>Whilst the highway has been designed to accommodate buses, a diverted route cannot be provided until the full link road is constructed leaving much of the site inaccessible by public transport.</p>
Proposed Development		
<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 Farrington Cricket development is approved. The 4-arm site access has been reviewed by the Highway Authority as part of the planning applications for both Farrington 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 84465-WSP-XX-DR-003: Stanifield Lane Access Junction to Residential Phase III illustrative only' 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 principles of the proposed access should be agreed at outline design stage to ensure that a suitable and safe access can be delivered.</p> <p>The principles presented in the Motts drawing do not relate to the current scheme and require land owned by Brookhouse to be delivered.</p> <p>The access shown in the Motts drawing would also prevent the Cricket Club Development from being delivered. A plan should be included demonstrating how the residential access can be delivered as a standalone access whilst not preventing the delivery of the Cricket Club Development should the residential site be delivered first.</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 (i.e. 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>This has been updated to remove any potential ransom strip from Zone A into the future industrial land.</p> <p>A ransom strip is still shown in Zone D which would prevent the completion of the entire link road.</p> <p>A suitable condition will be required to ensure that the road is constructed fully upto the site boundary to provide access into Brookhouse land</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 (i.e. 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>This demonstrates that the approach to the Transport Assessment has been to assess the strategic site as a whole and therefore it does not accurately assess the proposals included in the planning application, particularly in regards to the proposed link road.</p>
Policy Review		

<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 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>This comment fails to take into account the proposals which have been included in the submitted planning application.</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>The proposals include a ransom strip within Zone D which could prevent the development of the link road in its entirety. No detailed provision of access has been made to the residential land owned by Brookhouse.</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>The proposed development does not accord with the approved masterplan.</p>
<p>Proposed Development</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 changed 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. 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>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 response provides no justification for the use of new trip rates when the approved trip rates could be used to provide a like for like comparison with the approved scheme, particularly as the approach to the modelling assessment is to assess the impact of the development compared with the previously approved scheme.</p> <p>There is no justification for the why the previously assessed combination of industrial units, parcel delivery warehousing and commercial warehousing is no longer relevant to the site.</p> <p>Table 1.1 uses the previously approved trip rates from the MM TA and, where new uses have been introduced, the WSP trip rates have been used for consistency. The purpose of this table is to highlight that where WSP have attempted to show a reduction in trips from the development, it is purely from a change to the trip rates and not from the quantum of development and if the same methodology was applied to both schemes then the proposed development would have an increased impact on the highway network.</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>Confirmation from the Local Highway Authority on the agreement of the trip rates should be obtained. Other applications on land within the strategic site have been required to used the previously agreed industrial trip rates.</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.</p> <p>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). "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>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>Accepted.</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>Accepted.</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 Farrington Cricket site. Therefore, the trip generation is agreed and considered suitable for use as committed development flows within this TA.</p>	<p>LCCC trip generation was agreed after the initial modelling work was undertaken, this therefore needs to be updated.</p>
<p>Traffic Capacity Assessments</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>As noted above the proposed approach to the trip generation exercise is flawed. Based on the approved trip rates the site is expected to generate more trips than the approved scheme and therefore the proposed mitigation measures may not be sufficient to accommodate the proposed scheme.</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 approach to the Transport Assessment has been to assess the strategic site as a whole and therefore it does not accurately assess the proposals included in the planning application, particularly in regards to the proposed link road.</p> <p>Without the link road being delivered by this application, traffic flows on the A582 will be higher than those that have been assessed, and higher than those that were previously approved.</p> <p>On this basis it is unlikely that the proposed mitigation schemes on the A582 will be sufficient to accommodate the proposed development.</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>This approach fails to show what impact the development will have on the network and, due to the inclusion of the link road in the updated modelling, it fails to clearly demonstrate the change in traffic flows between the DM and DS scenarios from this application only.</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>This approach fails to show what impact the development will have on the network and due to the inclusion of the link road in the updated modelling, it fails to clearly demonstrate the change in traffic flows between the DM and DS scenarios from this application only.</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 Farrington 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>This should be included as part of the outline application to demonstrate that a safe access can be delivered without impacting the operation of the highway network.</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>Awaiting further information to review.</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>	<p>This response does not adequately address the point; however, we would expect that this would be subject to a suitably worded condition.</p>