

## Cuerden Lancashire

## WSP Transport Assessment Review No.3

Client:	Brookhouse Group	Job No:	J3250954
Date:	19 September 2023	File Name:	TN07 v1.1
Prepared by:	LCW	Approved by:	ME

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## 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 updated information submitted in relation to the Cuerden Strategic Site in Leyland (LCC application reference LCC/07/2022/00044).
- 1.1.2 Within the updated planning information submitted by the applicants were a revised drawing package by WSP, updated Highways Assessment documents by WSP and covering letter by Stantec (dated 20<sup>th</sup> July 2023).
- 1.1.3 This note (TN07) provides a review of the latest transport planning and highways related information and should be read in conjunction with Mode Technical Notes TN04 and TN06, and the WSP Comments Review table which provide comments on previously submitted documents. The Mode review documents are attached in [Appendix A](#).

## 2. Highway Access

- 2.1.1 Three of the four accesses will be submitted in detail/ full to enable early delivery of the highway connections. The continuous highways connection between the A49 and M65 Terminus, required to provide the through route necessary to alleviate traffic on the A6, has not been submitted in full; however, the junction modelling to support the scheme has included this.
- 2.1.2 A further connection would need to be made via the central Future Phase plot owned by Brookhouse onto Stanifield Lane to alleviate traffic on the A582. Without this, the traffic impact on the local highway network would be worse than has been presented.
- 2.1.3 Whilst the connection from Zone A is positive in terms of the Future Phase delivery, the access onto Stanifield Lane now being submitted in detail/ full does not include a link road through Zone D into the central Future Phase plot. This means that the complete through route between M65 Terminus and Stanifield Lane cannot be provided by Brookhouse as part of their future phase and relies on further discussion with the applicant to provide the connection into Zone D, potentially preventing the delivery of the through route.

- 2.1.4 There is also no connection shown within Zone D to southern Future Phase plot on Stanifield Lane or the within Zone E to the northern Future Phase plot, both of which are within the ownership of Brookhouse.
- 2.1.5 A summary of the departures from standard for the site access junction has been provided. This identifies a number of issues with the layout and some proposed actions; however, these have not been updated in the proposed drawings to show where standards can be achieved.
- 2.1.6 Provisional agreement with National Highways should be sought for any remaining departures from standard to ensure that the site access is deliverable.
- 2.1.7 A Stage 1 Road Safety Audit has been undertaken for the site access junction, but the document notes that this has only been undertaken based on the scheme drawing. The departures from standards documents should have been provided to the auditors for consideration. It is also unclear if the Road Safety Audit brief was approved by National Highways prior to the audit being undertaken on the Strategic Road Network.

### 3. Trip Generation

- 3.1.1 No updated trip generation assessment has been submitted which is required to address the majority of points raised in the consultation review; therefore, all of the points raised by Mode in the previous WSP Transport Assessment Review note (TN04, dated 5<sup>th</sup> December 2022) still stand.
- 3.1.2 The issues raised with the trip generation assessment also impact the overall validity of the Traffic Impact Assessment.

### 4. Trip Distribution

- 4.1.1 As part of the modelling assumptions, WSP have included two rerouting assumptions which reroute traffic through the site from the Wigan Road site access junction. A connection between Zone A and Zone B is not provided as part of the detailed planning application therefore a suitable condition will be required to prevent any development being occupied before the connection is provided.
- 4.1.2 A rerouting assumption has been made that 33% of traffic travelling between the M65 and Stanifield Lane will route via Lydiat Lane and through the Wigan Road site entrance, despite the diversion route being 1km longer than the existing route. Mode would dispute whether this is a reasonable assumption.

4.1.3 The Stanifield Lane / Lydiate Lane and Lydiate Lane / Wigan Lane junctions were modelled in the original WSP Transport Assessment (TA) but have not been reassessed with the recent increase in diverted flows. The TA notes that the Stanifield Lane / Lydiate Lane junction is already operating over capacity so further modelling and clarification is required as to whether mitigation is required to support the diverted flows.

## 5. Traffic Impact Assessment

5.1.1 Queuing Assessments from the VISSIM modelling, as presented in the '*Lancashire Central VISSIM Assessment Note*' dated 24<sup>th</sup> July 2023, show an excessive increase in queuing at the Stanifield Lane / A582 roundabout, where average queues on several arms are forecast to extend for up to 400m (1/4 mile) in the 2037 scenario.

5.1.2 In addition, the modelling scenarios within the '*Lancashire Central VISSIM Assessment Note*' do not include separate base and with development scenarios, as such it is not possible to ascertain / review the full impact of the development.

5.1.3 The modelling note '*70084465 - Lancashire Central – Modelling Note*' dated 25<sup>th</sup> July 2025 ' does not include any assessment of capacity in the text and all of the required outputs are not attached in the appendix.

5.1.4 The models have been calibrated based on queue lengths, whilst validating and calibrating models to queue lengths can be useful, JCT state within the LinSig use manual that: "*Due to the variability of queues and sensitivity to small changes in conditions both in models and in reality we recommend avoiding directly calibrating models to measured queues as unless done with extreme care and highly detailed data it has the potential for introducing significant inaccuracy into the model. It is recommended that a greater emphasis is placed on ensuring capacities are modelled correctly whilst still checking that modelled queues are acceptable*". Models that have been amended based on queuing should not be used to assess mitigation schemes.

5.1.5 Furthermore, some of the available modelling results in the appendices show junctions operating over capacity in the 2037 with development scenario.

5.1.6 The 2037 future year assessment fails to provide any indication of how the site will be built out and any intermediate phases where development could be occupied prior to the delivery of all infrastructure improvements.

## 6. Sustainable Accessibility

6.1.1 WSP drawing 84465-WSP-XX-DR-018 shows the introduction of a 2m footway along Stoney Lane to improve connectivity between the development and bus stops on Stanifield Lane. A connection is required to deliver a scheme which can be deemed accessible by sustainable modes of travel, and which therefore accords with the NPPF.

- 6.1.2 Alongside Elmar House there are sections of adopted verge which are only 1m wide where the carriageway is only 3m wide. The introduction of a 2m footway in this area could result in a remaining carriageway width of less than 2m.
- 6.1.3 WSP's plan has been drawn on OS mapping rather than the topographical survey which appears to show a wider verge to the north than is actually available.
- 6.1.4 In order to check the actual available carriageway widths if a 2m wide footway is introduced, topographical survey and land registry mapping along Stoney Lane has been used to take measurements. The results are shown in [Figure 2.1](#).

**Figure 6.1 : Stoney Lane Dimensions (based on Topographical Survey)**



- 6.1.5 As can be seen in [Figure 2.1](#), the introduction of a 2m wide footway on Stoney Lane would result in inadequate carriageway widths (less than 2m at points) on Stoney Lane and would therefore remove vehicular access to Brookhouse land and existing properties.
- 6.1.6 Notwithstanding this, even if this link could be provided, much of the site remains outside reasonable walking distances to bus stops and the site still requires the diversion of bus routes into the site.

6.1.7 On this basis, all of the points on sustainable access raised by Mode in the previous notes still stand, as there is no firm commitment to provide a diverted bus service within the site.

# APPENDIX A

## Previous Mode Review Documents

# Cuerden Lancashire

## WSP Transport Assessment Review

Client:	Brookhouse Group	Job No:	J3250954
Date:	05 December 2022	File Name:	TN04 v1.2
Prepared by:	LCW	Approved by:	ME

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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 20<sup>th</sup> 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.

## Cuerden Lancashire

# WSP Transport Assessment Review No.2

Client:	Brookhouse Group	Job No:	J3250954
Date:	21 February 2023	File Name:	TN06 v1.0
Prepared by:	LCW	Approved by:	ME

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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 updated information submitted in relation to the Cuerden Strategic Site in Leyland (LCC application reference LCC/07/2022/00044).
- 1.1.2 Within the updated planning information submitted by the applicants were a revised drawing package by WSP, updated Design and Access Statement by Fletcher Rae and covering letter by Barton Willmore (dated 10<sup>th</sup> January 2023).
- 1.1.3 This note provides a review of the transport planning and highways related updated planning information.

## 1.2 Highway Access

- 1.2.1 Overall, from a highway perspective, the changes made to the proposed Cuerden Strategic Site application now look to support the Future Phase developments of the allocated plots in the ownership of Brookhouse and create less onerous connections.
- 1.2.2 Three of the four accesses will now be submitted in detail/ full to enable early delivery of the highway connections so that the proposals align with modelling in the Transport Assessment. These highways connections (between A49 and M65 Terminus), provide the through route necessary to alleviate traffic on the A6; however, a further connection would need to be made via the central Future Phase plot owned by Brookhouse onto Stanifield Lane to alleviate traffic on the A582.
- 1.2.3 As noted in Barton Wilmore's covering letter (dated 10<sup>th</sup> January 2023):

*'The access and movement strategy shown on Parameter Plan 2 ensures that all areas of allocated land can be accessed, including that which is located outside of the red line boundary of the application site.'*

- 1.2.4 They also state that:

*'The movement network is shown most clearly on Parameter Plan 2, and the precise location of these routes are now highlighted and colour-coded on the highway plans. We trust that this*

*change provides sufficient clarification on this point and sufficient assurances that linkages will be provided across the Application Site and through to other areas of allocated land.'*

1.2.5 It would appear from the updated drawings that the internal spine road connecting from the north (Zone A) into the Future Phase central parcel of land owned by Brookhouse, has now been provided. As shown in **Figure 1.1**, WSP's Highways Layout Drawings (1 of 3), the new spine road is now shown to cross over the redline boundary into the central Future Phase plot which it did not do in the previous revisions. This, in addition to the points raised in the covering letter by Barton Willmore, suggested the removal of any potential ransom strip on this Future Phase; an extremely important point which needs to be confirmed within the conditions/ legal agreements to ensure the whole allocation is not prevented from being delivered.

**Figure 1.1 : Spine Road into Brookhouse Land** (source: WSP Drawing 84465-WSP-XX-DR-005)



1.2.6 Whilst the connection from Zone A is positive in terms of the Future Phase delivery, the access onto Stanfield Lane now being submitted in detail/ full does not include a link road through Zone D into the central Future Phase plot. This means that the complete through route between M65 Terminus and Stanfield Lane cannot be provided by Brookhouse as part of their future phase and relies on further discussion with the applicant to provide the connection into Zone D, potentially preventing the delivery of the through route.

- 1.2.7 There is also no connection shown within Zone D to southern Future Phase plot on Stanifield Lane or the within Zone E to the northern Future Phase plot, both of which are within the ownership of Brookhouse.
- 1.2.8 It should be noted that whilst the updated Design and Access Statement shows potential for a future connection to the southern Future Phase (but without providing one within the detailed planning drawings), there is not potential future connection included to the northern Future Phase.

### 1.3 Traffic Impact Assessment

- 1.3.1 It should be noted that latest updates only include an updated drawing package setting out the extent of internal highway and access junctions which will be included in the detailed element of the application. No updated Transport Assessment has been submitted which is required to address the majority of points raised in the consultation review; therefore, all of the points raised by Mode in the previous WSP Transport Assessment Review note (TN04, dated 5<sup>th</sup> December 2022) still stand.

### 1.4 Sustainable Accessibility

- 1.4.1 The updated Design and Access Statement states walking distances from the edge of the site to public transport nodes, which fails to consider the total walking distance for future users. It notes that discussions are underway to assess if bus services 111 and 109 could be diverted into the site.
- 1.4.2 On this basis, all of the points on sustainable access raised by Mode in the previous WSP Transport Assessment Review note (TN04, dated 5<sup>th</sup> December 2022) still stand if there is no firm commitment to provide a diverted bus service within the site.

Mode Objection Comments	WSP Response	Mode Response
<b>Existing Conditions</b>		
<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>
<b>Proposed Development</b>		
<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>
<b>Policy Review</b>		

<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><b>Proposed Development</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 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><b>Traffic Capacity Assessments</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>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>