Tyra Thompson

From: [redacted]
Sent: 20 September 2021 12:58
To: SRPlanning
Subject: Planning application 07/2021/0086/ORM and 07/2021/00887/ORM

Dear sir / madam,
I right to you in regard to the subject planning permission. I have a major concern that the road infrastructure in the area cannot handle another 920 dwellings. I am already seeing highly increased traffic on penwortham way resulting in alot of the times some major tailback during rush hours. This only worsens when there is an incident on the motorway as it leads to one of 3 ribble crossing points. (There seems to be alot of incidents on that stretch of motorway recently). And leyland lane is very often backed up most of the way down during these hours. This will increase more as more people return to work post pandemic and the developments that continue in Farrington. I therefore would object to this planning on grounds that the road infrastructure in the area cannot handle the excess traffic. Also of concern would be rain water drainage and run off onto penwortham way which could increase the number of accidents in that locality.
Regards
[redacted]

Tyra Thompson

From: [redacted]
Sent: 23 September 2021 16:25
To: SRPlanning
Subject: Pickering's Farm Site, Penwortham - Application A & B

Dear Sirs,

Further to your letter dated the 16th September 2021 with regards to the above planning applications I would like to put my objection into this going ahead.

I live on Fir Trees Crescent in Lostock Hall and if this planning goes ahead it will not only ruin the little countryside that we have left here it will create a whole new issue with traffic backing up down Leyland Road. The new road built (the Cawsey) which runs from Leyland Road to the Capitol Centre was supposed to make life easier for traffic going to and from town. However, when there are any roadworks/temporary traffic lights on Leyland Road, which there has been recently, it creates a bottleneck from the Cawsey roundabout. We have enough traffic problems within this area as it is with everyone trying to get in and out of Preston town centre, even more so when there are accidents on the M6 and traffic gets off at the Bamber Bridge turn off. Building this development will only create more.

If this development goes ahead I dread to think how it will affect the traffic from Coote Lane and Bee Lane. Traffic will cut through the housing estate where I live which can bring you out down Flag Lane back onto Leyland Road. This is not ideal for the residents that live in these areas and at peak times would prevent us from being able to get out of our own streets as the traffic would be at a stand still. I also dread to think about the amount of car pollution this will also create which could cause ill health to the residents of this area. There are also plenty of children that play out in these streets and an influx of traffic could see the rise in unnecessary accidents/deaths.

I mentioned earlier in my email about the little countryside we have left around here. Since Covid 19 I personally have done far more walking than using my car and it has been great to get out and about and experience lots of fantastic walks that are in and around this area. This development will be taking this away from us not to mention what it would do to the wildlife and farms that are situated in this area.

You may not see these objections as reasons to prevent this development from going ahead, although I feel they are valid reasons, however I would appreciate it if they could be taken into consideration when making your decision.

Kind regards
[redacted]

Tyra Thompson

From: [redacted]
Sent: 26 September 2021 11:00
To: SRPlanning
Cc: Janice Crook
Subject: Pickering's Farm Site (Penwortham)

Good Morning,

I wish to raise an objection on the above mentioned proposed housing estate, for the following reasons.

At this moment in time, people are already using the bottom end of Cop Lane/Pope Lane as a potential Rat run for vehicles causing heavy carbon emissions and noise in the area of Pope Lane into Cop Lane and up to and including the Millbank traffic lights.

It is obvious that traffic is approaching the Pope Lane slip road from the A582 from Leyland, turning right into Pope Lane and then turning left into Cop Lane and then turning right at the Millbrook traffic lights gaining access to the bye pass into Preston.

At the same time, traffic is using the A582 from Preston to gain access onto the bye pass, and taking the Cop Lane slip road turning left at the traffic lights onto Cop Lane, then proceeding towards the Pope Lane junction, turning right towards the traffic lights on the A582, then turning left at this junction towards Leyland.

Sadly these volumes of traffic are already at a heavy volume, causing traffic pollution, dirt and litter being dropped from vehicles and heavy traffic delays in the area, along with potential road damage, as it is obvious this route is being taken so as the traffic can miss the disastrous roundabout and traffic light issues adjacent at the Brown Hare public house location.

So the issue for my objection is that this stretch of road will just get busier if the housing estate is built, causing more concern and worry for local residents, who are already concerned about heavy traffic volumes.

On closing I would ask if at all possible a traffic survey could be arranged around the Hill Road South junction with Cop Lane between 0745 and 0930 hours and also between 1530 and 1800 hours that will show the volume of traffic at these times for consideration of potential traffic moving forward.

Thank you for your time,

Regards,

[redacted]

Tyra Thompson

From: [redacted]
Sent: 26 September 2021 17:23
To: SRPlanning
Subject: pickerings farm

Thank you for writing to me concerning the outline proposals which are for a colossal development.

It will mean a further 2000 plus cars on the highway. I find the noise from the traffic at unacceptable levels currently and the volume of this proposal will mean noise levels similar to those of the M6. I suggest wide noise screening.

May I draw your attention to several city sites which would fit those numbers in as Borough sites.

Vauxhall showroom site, Leyland. Brownfield adjacent to train station and main road. Could fit 30 in.

Oyston Mill, Ashton. Next to main roads. Could fit about 30 in.

Fulwood Barracks museum site, London Road. Could fit low cost flats in.

Fulwood Barracks site, Fulwood on main roads. Could fit about 200 in.

Cuerden industrial sites, Bamber Bridge.

Defunct waste recycling site, Leyland.

The site is on the edge of the greenbelt and your decision to grant houses adjacent to me in the greenbelt leads me to believe you wish to concrete over the greenbelt. The houses will eventually merge over the carriageway.

They are the council estates of the future.

I thought Brexit created a desire to be self sufficient in food production. The grading of the Borough's farmland is some of the best in the UK. Once it is gone, it is gone forever. I dont believe populations have ever respected the hard labour required as custodians of it so perhaps they dont deserve it.

Best Wishes.
[redacted]

Tyra Thompson

From: [redacted]
[redacted]
27 September 2021 16:42
To: SRPlanning
Subject: ref OBJECTION to 07/2021/00886/RM and 07/2021/00887/ORM

I would like to send my objections in against the recently submitted outline planning application from Taylor Wimpey and Homes England.
I have read through the documentation and it will have a major impact on our lives as we live at Honey Pot Barn on Bee lane which is right in the middle of the proposed development.
We will be living on a building site for the next 10 years and it will also have a financial impact on our existing property which is a rural barn conversion dating back to the 1900's.
Our well being will also be impacted as we currently live in a quiet semi rural environment.
The development will have an impact on all the local residents who use Bee lane for their health and well being. The wildlife and environment will also be eliminated by this development.
The overcrowding on the local road network will be heavily affected which will put stress and strain on local residents.
I would like the council and homes England to rethink about developing this area of Greenfield beauty and look at developing Brownfield sites before they ruin the last of the greenfield area in South Ribble.
I would welcome a face to face discussion with Taylor Wimpey and the council as this has a direct impact on my property and we have not had any meetings since 2018.
Regards
[redacted]

Tyra Thompson

From: [redacted]
Sent: 27 September 2021 13:36
To: SRPlanning
Cc: Janice Crook
Subject: 07/2021/00886/ORM AND 07/2021/00887/ORM

Mrs Janice Crook,

I am writing to you with regards to the consultation for the above proposed development, as this development with have a major impact on our property not to mention taking away our rights for Green Space and privacy. I would like to raise the following concerns below:

> No provision for existing residents been offered up, local residents will be subject to living on a building site for many years, existing properties to be over looked and privacy taken away
>Increase in traffic around Leyland Road and Bee Lane area once the site is completed, increase in potentially 4k cars if 2,000 homes are to be built
>Although the master plan makes specific reference to the construction of a new bridge over the west coast line to access Leyland Road from the new Cross borough link road this will have a massive increase in cars and will put pressure on small highways in the area
>The proposed plan for the Primary School - Please enlighten me how a double intake school, will have sufficient drop off and collection for parents to park? this with surly have an impact on near by roads for example Bramble Court which at present is a quiet residential cul-de -sac with alot of residents being retired - can SRBC/TW provide this residents with reassurance that there road will not be used as a car park?
>Please provide information who will fund the school after the 2 year period expires?
>The 3 G sports pitches mentioned in the new master plan - would this be handed over to the council for adoption? as its not shown on the development site currently maintained by Penwortham Town Council?
>Ecology report the survey under taken of Pickering's will ride roughshod and destroy valuable wildlife, in its present form all bar 5 trees and all hedgerows can be ripped out ! The planning should be refused on these issues alone!
<Flooding the area is renowned for Flooding - my garden especially, I would like some guarantees typically in writing that building houses on this land if proposed will not bare more of an issue on my property.

I have also put my objections forward to SRBC planning previously I trust this points will also be carried forwarded to the planning committee.

Yours Faithfully,

[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Size

Comment:I wish to object to this proposal on the grounds of its size and the resulting pollution to the area. By my maths nearly 1,000 homes with 2 to 3 cars etc at each residence means there will be increased pollution and congestion on the road system from 2,000 extra vehicles. To my knowledge, with no public transport etc this will add to climate change at a time when the opposite is vital. The only way an out of the way development like this could be allowed would be with a 15 minute bus service, a new railway station and priorty cycle lanes to make a 'green' example of the way forward - not more of the same failed developments.

[redacted]

Tyra Thompson

From: [redacted]
Sent: 28 September 2021 10:54
To: SRPlanning
Subject: PLANNING APPLICATION 07/2021/00886/ORMAND07/2021/00887/ORM

Having looked at considerable length at the application form and plans outlined I see no benefit whatsoever to approving the application.
Having lived in this area since 1970 I have seen a steady decline in the quality of life for the existing residents.
For example,
Pollution due to heavy traffic. This was partially resolved with the penwortham bypass and the opening of the link road to Walton le Dale. This will all be undone
Increase in anti social behaviour which has been a long standing problem in the Kingsfold area. This will only get worse
Plans for the infrastructure will not meet the needs of the increased demand such as shops, Medical centre.etc
Lower Penwortham has been the poor relative when it comes to planning for the future of the existing residents. A good example is to take a look at Higher Penwortham. No big housing development but thoughtful planning introducing shops,cafes,restaurants,wine bars AND reducing the flow of traffic Not increasing it.
That's the type of planning application we need for improvement of services and amenities for existing residents...
Tackle the problems that exist rather than adding to them

[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Size

Comment:The Roads & surrounding area will not be able to cope with the added traffic from the development, Regardless of any plans to add extra lanes or create new access routes, The roads around Lostockhall, Penwortham & Bamber Bridge still struggle to cope with the amount of traffic in the area & commuting locally is getting more & more difficult. No new School is required, Any new development should be investing in the Local schools & Shops in the area to encourage people to stay more local & invest in the local community.

Tyra Thompson

From: [redacted]
Sent: 11 October 2021 11:48
To: SRPlanning
Cc: Janice Crook
Subject: Planning applications 07/2021/00886/ORM and 07/2021/00887/ORM

Good morning,

I am writing on behalf of Moor Hey Specialist School.

We are concerned about the proposed developments on Pickering's Farm Site.
The school is based off Leyland Road. The development of the houses off The Causey have already made a significant impact on the traffic on Leyland Road.

Most of the pupils in school are brought into school on a taxi or LCC transport buses.
The children are often in after the start of the school day at 9am due to late taxis sat in traffic in or around Leyland Road.

The traffic backs up from the roundabout at the top of The Causey and Leyland Road which is made worse by the cars parking on the road on the stretch by the old pub (Sumpter Horse)

It backs all the way back into Lostock Hall. The idling traffic is causing pollution as cars move very slowly along Leyland Road.

If more houses are added and more cars which come with the houses it will be longer stationary queues causing the pupils to be sat even longer on the buses as they try to get to school.

The impact on the pupils who have significant needs means that the longer journey and waiting can cause them to go into crisis on the buses and have unsettled starts to the day in school.

Leyland Road needs to be considered and how to ensure free flowing traffic as much as possible before the addition of more houses.

Thank you for your consideration

[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Interested Party

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Privacy

Comment:The scale of the development, lack of infrastructure, ie roads, reduction in green space, flooding, biodiversity loss, air quality. I wish my objections to be ongoing.

Tyra Thompson

From: [redacted]
Sent: 13 October 2021 18:32
To: SRPlanning
Subject: Ref 07/2021/00886/ORM 07/2021/00887/ORM

Dear Janice

We would like to lodge an objection to the planning application for the references above. The Lanes-Pickerings Farm.
This has been rejected several time's before for very good reason and should not be allowed to keep going to appeal causing unrest to many of the local residents.
At the moment many of us see the wildlife in the surrounding fields if this was to go ahead all these creatures would disappear. We see Foxes, Birds, Frogs, hedgehogs and Bats to name a few not to mention the Cows, sheep and horses. There would also be a loss of privacy for many of us and we all chose to pay a premium to live in the Countryside. The building of so many homes would impact the noise levels. Also with so many homes if they all had 2 cars which is common now that is a lot of extra traffic to an area that already suffers from bad congestion and not to mention the vehicle emissions causing pollution. Also there is the light pollution at present if we go in the garden it is dark a new estate would have lots of new streetlights and car headlights which would spoil the area and impact the wildlife.
The back of our property is meant to be protected green belt land when are we going to stop building on these areas and start to plant more trees to protect the planet. At the moment if it rains heavily in summer or winter the fields flood how is a new housing estate going to help with this it will just make the problem even worse. You only have to watch the news to see how developers do not care about the people the sell the houses to and often do not follow through on their promises. A good example of this is the housing estate across Leyland road when the developer said they would develop shops to create jobs and when it was nearly finished changed their minds and built more house for a bigger profit. More control's should be in place to stop this happening.
Please consider this application very carefully as it will have a massive impact on Penwortham, Lostock Hall and the environment.
Yours faithfully
[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Interested Party

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Privacy
- Size

Comment:Have Taylor Wimpey addressed ANY of the issues and concerns raised from the last REJECTED Masterplan?????

Still no infrastructure ....no new bridge access.....ALL the reasons that were rejected the last time round have still not been addressed.....i hope that S.R.B.C are not fooled by this new unapproved masterplan attempt :(

Tyra Thompson

From: [redacted]
Sent: 14 October 2021 12:51
To: SRPlanning
Subject: FW: Objections to the lanes development

1. Government haven't rules changed re housing on green belt
2. In the present climate e.g., post Brexit and still in COVID, housing needs will need to re assessed not just blindly carry on regardless.
3. Health climate, we should be keeping greenery not building on it
4. Health, the NHS currently has a large shortage of GP's how can additional load on the NHS be allowed?
5. Golden way – traffic congestion already existent
6. Leyland road – traffic congestion existent

[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Size

Comment:The proposed location of the school is likely to introduce additional vehicular traffic and parking to Kingsfold Drive and Bramble Court as parents/carers seek to avoid the A582 access route.

The school is also located next to a surface water management zone which may pose an increased risk to child safety.

The proposed play area and village green are positioned where it is subject to considerable flooding over a period of many months which would thus render it unusable.

Bee Lane access is likely to be in excess of the unsubstantiated predictions thus contributing to a worsened air quality in the vicinity. The restricted width of the rail bridge in conjunction with the increased traffic flow would increase the risk of vehicular and pedestrian collision.

The gateway junction on the A582 will lead to not only an increase in traffic levels, but an associated decrease in average speeds, increased NO2 and other pollutants.

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Size

Comment:This is a part of the earlier application which was rejected. Nothing material has changed except for the splitting off. This development will erode the small green belt which separates the southern towns and villages from Preston City sprawl. Houses built on this green field will not meet the housing need for small units where there is established public transport and support services but will just further flood South Ribble with large poorly designed and built new homes while many similar lie empty due to recent overdevelopment. Development will add to current traffic and air pollution issues being experienced in South Ribble. Dangerous access to and from the site has not been addressed. Build of a primary school is not within developers remit and has no connection to reality where there are primary places but pressure on secondary. Not needed, not wanted and detrimental to South Ribble.

Re Planning Application Ref. No: 07/2021/00886/ORM (Application A) and Ref: 07/2021/00887/ORM (Application B)

As the owners of [redacted] we would like to raise the following objections to the above Planning Applications:

Specific to Application B

- Whilst the application states that *"all matters reserved except for the principal means of access"* the Masterplan shows that the entrance/exit road to Pickerings Farm (our property, not the development as a whole) and also Langdale is to be severed without any alternative shown. It should be borne in mind that we both have historic and documented rights of way from our properties to the Flag Lane/Lords Lane junction which cannot be removed. The proposed road shown on Taylor Wimpey's plan crosses the access road which to the best of my knowledge belongs to neither Taylor Wimpey nor Homes England.

Common to both

- The development will potentially introduce an extra 2000+ vehicles onto a road network that is already over congested (i.e. Leyland Road and Penwortham Way). This will inevitably lead to more accidents and make the currently difficult travel through the area significantly worse, especially taking into account the apparent increased traffic The Cawsey link road has introduced. It's significant that Taylor Wimpey chose to update their traffic flow figures during the pandemic and the "Work from Home if possible" message chanted by the current government.

- The Masterplan states *"The existing lanes, many of which are already adopted highway and PRoW, provide the opportunity to create an active travel network within both sites which respects the local setting and seeks to retain much of the rural character.* ***This can be achieved by ensuring there is no increase in motor vehicular traffic using existing lanes, within both sites, through infrastructure and alternative routeing arrangements****."*. There's absolutely no evidence or suggestion how this is going to be achieved.

- The additional car and commercial vehicle traffic will result in a significant worsening of the air quality in Lostock Hall, Penwortham and Walton-le-Dale. All three areas are currently designated as AQMAs.

- Until the CBLR is fully completed a significant amount of traffic will use Flag Lane and Bee Lane to access and exit the site. Neither Flag Lane nor Bee Lane is suitable for such an increase in traffic, especially the single way railway bridges on Flag Lane.

- An earlier Masterplan stated that there was a "short term access option" so that "access will be restricted to use by existing properties on the site and 40–50 new dwellings". I cannot see any such restriction in the current Masterplan, therefore I must assume that it will be open access on to Flag Lane, which is mostly single track. Application B for 180 properties on the Flag Lane side would entail a significant increase in traffic along this width restricted road.

- The CBLR, along with a suitable bridge over the West Coast Main Line should be in place before any houses are built otherwise it will be unlikely to materialise.

- 1100 additional homes within one catchment will put significant strain on the existing sewerage system. I am led to believe that there are already capacity issues in the local sewer network and treatment capacity issues at the local treatment works in Walton-le-Dale. This is without considering the sewerage requirements of existing residents whose properties are not currently connected to the s[redacted].

- Currently the 224 acres of green fields act to absorb rainwater. This reduces the volume of water reaching field ditches and significantly slows its departure from the site. A full development of the site, even with SuDS, will lead to rainwater running off significantly faster and will almost certainly add volume at critical times to the currently flooding issues at Coote Lane, School Lane, Middleforth and to the access to Pickerings Farm itself. The Environment Agency obviously has little knowledge of the area if they claim that the flooding risk is low, as the current residents will confirm that Flag Lane and Lords Lane suffer from flooding and as already stated access to Pickerings Farm is often affected, as much as a depth of 18 inches, when there is heavy rainfall due to rainwater run-off from the surrounding fields which are part of the proposed development resulting in an inability to access or exit the property.

- The area south of Bee Lane, between the dairy and Lords Lane floods every winter, with flood water often covering Bee Lane and Flag Lane.

- There are significant deficiencies in social care/health facilities, e.g. doctors, dentists, care homes. Whilst the Masterplan shows an allocated space for a community centre there is no funding for any additional social services in the area and these spaces will, no doubt, simply revert to housing use after a short time frame.

- A new 2 entry Primary school is planned however there is no apparent commitment to fund its staffing. Can LCC afford to staff it?

- Contrary to Taylor Wimpey's apparent expectation that changes to employment patterns due to Covid will result in less travel to work the current situation appears to be that traffic is back to almost pre-Covid levels. Absence of local employment opportunities means that this will be a commuter development with all residents commuting elsewhere by car. This will exacerbate the issues of congestion and air quality again. The lack of demand for freehold commercial properties and the absence of any enquiries will mean that the space allocated is not used and is returned to housing after a short time resulting in yet more vehicle congestion and reduction in air quality.

- Crime in the area is already at unacceptable levels with anti-social behaviour and burglary of particular note. Police resources are currently stretched and this development will only serve to stretch them even further.

- The idea of having a mobility hub with the provision of e-scooters is worrying. Regular news items have identified the anti-social use and injuries to pedestrians and other road users caused by incorrect usage of this misguided form of transport due to the current lack of effective regulation.

- Traffic noise and vibration will be a huge issue for residents bordering Penwortham Way to the west and Leyland Road to the east. The traffic figures used in the Masterplan appear to have been collected during the Covid lockdown/"Work from Home" period and are thus unrepresentative of reality.

- Both a Park and Ride scheme and a railway halt were originally proposed but neither have been included in the current Masterplan. There are no realistic sustainable transport initiatives, including leaving land aside for a tram connection into the town centre. There is no evidence that the development will be served with a suitable bus service which will be essential to persuade people to use public transport.

- There will be a significant adverse impact on nature conservation and biodiversity with the loss of farmland and orchard habitat for a large number/variety of birds, mammals and invertebrates. The current scoping reports are inadequate covering only 50% of the site and avoiding the wildlife hotspots.

- The Design and Access Statement states that *"The scale and density of developments will be appropriate having regard to the character and appearance of the area and will enable in the region of 1,100 new dwellings to be delivered across the two sites".* I fail to see how 1100 new dwellings (1350 if you include their overall Masterplan which will no doubt appear again) can possibly have any regard for the existing character or appearance of the area.

- Two and a half/Three storey properties are not appropriate to the existing rural area. None of the current properties are of this size.

- There is mention of charging points for Electric Vehicles, but only for those properties with a garage or a driveway and then only one per property. What are Taylor Wimpey's plans for the houses without driveways? Will they be providing long extension leads for EV owners to drape across the hedges and footpaths?

- Road plans are based on vehicle sizes from 2006, surely that requires updating as in the intervening years cars have actually got larger.

- The Masterplan shows no sustainable challenging Climate Change design incorporated within it. *"Local and combined authorities are at the cutting edge of the climate change challenge because they have responsibility for decisions that are vital to our collective future."* [Source:Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change: Town and Country Planning Association (TCPA) and the Royal Town Planning Institute (RTPI) 2018]. The destruction of green spaces and removal of trees will have a detrimental effect.

- An overall concern is that the Masterplan talks about getting to Carbon Neutral by 2030. Have we learned nothing from the last couple of years (or more) that action needs to be taken now? All new developments should be immediately Carbon Neutral and fully equipped for fossil fuel free living otherwise someone other than the developers will pick up the bill for retroactively upgrading the new builds to comply with what we already know is expected in the near future. The current Government's policy is to phase out the use of gas for home heating, yet Taylor Wimpey's plan is for the first 250 homes (at least) to be supplied with gas.

[redacted]

Tyra Thompson

From: [redacted]
Sent: 17 October 2021 19:36
To: SRPlanning
Subject: Planning Application Objection - 07-2021-00886-ORM

Dear Planning Committee,

Please accept the following reasons as objections to the above planning application.

The application is largely the same as the previous Pickerings Farm application which was dismissed by SRBC Planning Committee;
The plan will result in significant traffic congestion despite the opening of the new link road opposite Bee Lane through to Carrwood Road;
The plan will erode what little is left of the existing greenbelt area between Penwortham and Lostock Hall resulting in further urban sprawl and further loss of distinct communities;
Further house building of this magnitude is not required in the local area;
The type of housing proposed will not meet local need;
The proposed plan will take a number of years to complete resulting in local disruption for an unacceptable prolonged period;
Local infrastructure is already under pressure and despite a planned new two form entry primary school further places will be needed. The local primary school is already over subscribed.

Yours sincerely,

[redacted]

Tyra Thompson

From: [redacted]
Sent: 17 October 2021 21:38
To: Janice Crook
Cc: SRPlanning
Subject: planning objections 07/2021/00886/ORM

Dear Sir or Madam,

To Whom it may concern

[redacted]

I reside at the address above. I have studied the recent plan sent in by Taylor Wimpey (TW).

I have a number of objections but the main concern I have the access and egress from the proposed development. There appears to be some form of proposed access restrictions to be applied initially at the Bee lane junction were is meets the Borough Link road.There is no scope for any alterations or restrictions at the Bee lane junction that effect the entry or egress from Bee Lane for its residents.
Planning for the proposed development should not proceed until all planning for the road network has been completed and costed. A lot of detail has been documented in relation to access from the Penwortham by-pass side of the development but a distinct lack of detail regarding what is required at the Bee lane junction.
This I feel has been left out at time for a reason known only to TW.
There is no doubt that extensive works will be required. At the very least it will require a new dual lane vehicle bridge spanning the West Coast main line and considerable road network modifications.
This above works required will be of great cost and as a concerned tax payer I feel that both sides of the proposed development should be costed and that works completed prior to any planning consent being granted at the cost of any potential developer.

If you require any further comment my email address is

[redacted]

Yours Faithfully

[redacted]

Tyra Thompson

From: [redacted]
[redacted]
To: Janice Crook; SRPlanning
Subject: planning objections 07/2021/00886/ORM

To Whom it may concern

[redacted]

[redacted]

I reside at the address above. I have studied the recent plan sent in by Taylor Wimpey (TW).

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If you require any further comment my email address is

[redacted]

[redacted]

[redacted]

Tyra Thompson

From: [redacted]
Sent: 17 October 2021 19:40
To: SRPlanning
Subject: Planning Application Objection - 2021-00887-ORM 180

Dear Planning Committee,

I object to the above planning application for the following reasons:

The application forms part of the previous Pickerings Farm application which was dismissed by SRBC Planning Committee;
The plan will result in significant traffic congestion despite the opening of the new link road opposite Bee Lane through to Carrwood Road;
The plan will erode what little is left of the existing greenbelt area between Penwortham and Lostock Hall resulting in further urban sprawl and further loss of distinct communities;
Further house building of this magnitude is not required in the local area;
The type of housing proposed will not meet local need;
The proposed plan will take a number of years to complete resulting in local disruption for an unacceptable prolonged period;
Local infrastructure is already under pressure and despite a new two form entry primary school further places will be needed. The local primary school is already over subscribed.

Yours sincerely,

[redacted]

Tyra Thompson

From: [redacted]
Sent: 17 October 2021 21:49
To: Janice Crook; SRPlanning
Subject: planning objections 07/2021/00887/ORM

Dear Sir or Madam,

To Whom it may concern

[redacted]

[redacted] above. I have studied the recent plan sent in by Taylor Wimpey (TW).

I have a number of objections but the main concern I have the access and egress from the proposed development.
There appears to be some form of proposed access restrictions to be applied initially at the Bee lane junction were is meets the Borough Link road.There is no scope for any alterations or restrictions at the Bee lane junction that effect the entry or egress from Bee Lane for its residents.
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This above works required will be of great cost and as a concerned tax payer I feel that both sides of the proposed development should be costed and that works completed prior to any planning consent being granted at the cost of any potential developer.

If you require any further comment my email address is

[redacted]

Yours Faithfully

[redacted]

Tyra Thompson

From: [redacted]
Sent: 18 October 2021 18:07
To: SRPlanning
Subject: Planning applications 07/2021/00886/orm , 07/2021/00887/orm

The attention of Mrs Janice Cook .
I am taking this opportunity to raise my immense concern in regards to the above planning applications , my worry is primarily in the movement of traffic in the surrounding areas, as a resident in the lostock hall area for a number of years it's my first hand experience in seeing the almost unstoppable increase in the traffic that as becomes a real problem to everyone . There was a time maybe ten years ago when the traffic saturation was beginning to increase quite gradually , now with the proposed building of thousands of houses in this very small area of what was a rural community is a major worry, the health and well-being of the residents now and in the future is and will be greatly compromised. There is a limit to what any area can absorb before it will make everyone lives a misery, we should be improving the quality of life in these difficult times, instead we are following each other to a dangerous and non-reversible situation where mass construction of houses, mass increase in traffic will come into conflict with a shortfall of local amenities and a shortfall in quality of life.
Yours respectfully [redacted]

Tyra Thompson

From: South Ribble Info
Sent: 14 October 2021 12:50
To: Planningapplications
Subject: FW: Objections to The Lanes development

From: [redacted]
Sent: 14 October 2021 12:48
To: South Ribble Info <info@southribble.gov.uk>
Subject: Objections to The Lanes development

1. Government- haven't the rules changed re housing on green belt
2. In the present climate e.g., post Brexit and still in COVID, housing needs will need to re assessed not just blindly carry on regardless.
3. Health climate, we should be keeping greenery not building on it
4. Health, the NHS currently has a large shortage of GP's how can additional load on the NHS be allowed?
5. Golden way – traffic congestion already existent
6. Leyland road – traffic congestion existent

[redacted]

KBLR Review of the Lanes planning application Transport Assessment by Vectos.

Planning application 07-2021-00866-ORM and 07-2021-00867-ORM

The Vectos TA is split into two parts in the planning application documents library. In this review the first part of the TA with PDF ref number 226184 is referred to as TA1, and the second part with PDF reference number 226183 is referred to as TA2.

1 Executive Summary.

- The local primary schools in the development catchment are currently under pressure with four of the five schools listed by Vectos at or close to capacity. Committed development demand in the catchment will take any remaining capacity resulting in an effective absence of any primary school places within a two mile radius of the site at the onset of the proposed development. It is estimated that the site will have a population of 523 primary school children.

- Secondary schools in the catchment are also currently under pressure with two of the four listed by Vectos currently exceeding capacity. Of the remaining two with capacity, committed developments will reduce this such that only one secondary school, Penwortham Priory, 3.8 km from site, is likely to have any capacity at the onset of the proposed development. This will severely curtail parent choice in the locality and drive demand further afield. It is estimated the site will have a population of 307 secondary school children.

- No attempt has been made by Vectos to establish the development demographics to understand the levels of demand for local education and health service provision. In addition it appears that no account has been made of the need for formal pre-school facilities, and how this will impact trip demand. It is unlikely that there will be sufficient local pre-school facilities to cater for the demand of up to 493 pre-school children.

- This lack of local Education infrastructure will increase car dependency, and is an illustration of the poor quality of the Vectos transport Assessment background research, especially as a key strand of their proposition is that the numerous local schools "available" in the catchment will reduce car trip demand.

- No account has been made by Vectos in their trip analysis for the provision of 30% affordable/social housing which can have significant impact on demographics and trip demand.

- The committed developments and the proposed development will add over 10,000 people to the local population, with a significant proportion being under 5's and over 65's. This will place local GP and health facilities under severe strain. It is estimated that an additional 5 GP's plus buildings and support staff will be required to provide for this additional population.

- It is unclear if the responsible authorities are aware of the magnitude of the problem facing the region in terms of healthcare and education provision, and what planning has taken place to ensure such essential services are made available into the future..

- Because Vectos have not accounted for population demographics that are specific to new developments of this scale, nor the adequacy of local social infrastructure to support such demographics, their estimation of trip demand and modal split is woefully inadequate.

- Using a trip demand based on likely site demographics it has been found that the Vectos estimation of trips from site has been underestimated by 78% for the am peak and by 61% for the pm peak. This leads to significantly underestimated traffic delays on all local routes and the A582 in particular

- There appears to be systemic errors in the Vectos analysis, for example for all categories of trip eg education, commuting and leisure there is a significant disparity between total arrivals and departures. This is particularly perplexing for education trips where site arrivals and departures by car are 238 and 330 respectively over the standard 12 hour evaluation period, with the implication that approximately 100 children are departing by car in the morning and not returning home after school.

- Other worrying discrepancies can be found in their methodology for model journey time validation shown in the Vectos TA2 tables 17/18 and 19. It has been found that on some of the key routes the observed journey time from Tom Tom data, used to validate model predictive results, does not accord with journey times indicated from Google maps, as significant errors are apparent, with Tom Tom appearing to significantly underestimate journey time at peak hours.

- It has also been found that the Vectos trip rates assigned to committed developments has been underestimated by 30% for the peak hours. This results in a significant underestimation of traffic congestion impacts, making the contribution of the planned development even more severe.

- The estimated two way traffic flow on the A582 from the committed development and the Lanes will add 1,763 two way car trips at the am peak to an observed daily two way am peak traffic flow of 2,125 measured in 2018. The Lanes will be responsible for 888 of these additional two way trips. This is a huge increase in peak traffic flow.

- The committed development and the Lanes will add 11,753 daily average traffic flow to the currently measured (2019) value of 18,872 on the A582. The total daily flow will therefore increase to 30,625. The lanes will be responsible for contributing 5,920 of these additional two way daily trips. Note the LCC congestion reference two way flow for the A582 is 22,000.

- The impact of the trip rate underestimation leads to significantly increased journey times on key routes. In particular for the A582 from the Tank Roundabout to the Penwortham Triangle (Route 1). For example at the am peak Vectos estimate that committed developments will add 6.8 minutes to the journey time, however using more realistic trip rates estimated in this analysis results in a journey time increase of 8.8 minutes.

- For the same route for the scenario of committed developments plus the Lanes Vectos estimate a delay of 8.5 minutes however use of more realistic trip rates estimated in this analysis leads to a journey time increase of 15.1 minutes.

- Similar patterns of journey time increase are observed for the pm peak. Given that under current road conditions Google maps predicts an average peak hour journey time of between 9 and 11 minutes, these predicted journey time increases will be catastrophic for the region.

- It should also be noted that congestion on the B5254 will also be catastrophic as a result of committed development and the Lanes. The data from Vectos TA2 table 7.5 shows that the delays resulting from committed developments will add 12.8 minutes to pm peak journey times, and the addition of the Lanes will increase this to 15.3 minutes. Similar delays are anticipated for the am peak The actual delay is likely to be far higher, as Vectos significantly and consistently underestimate trip demand. It is believed that these delay figures will increase to 17 and 20+ minutes respectively. Such delays will effectively render any bus service using this route non-viable

- Much more concerning is the impact that such delays, along the B5254 corridor and the A582, will have on the AQMA 3 Lostock Hall, AQMA 4 Bamber bridge and the AQMA 1 in Penwortham. The air quality in these locations is some of the worst in the UK. The anticipated increases in traffic volume as a result of committed development and this proposed development, combined with the increased congestion, will significantly worsen air quality leading to higher levels of illness and premature death in the local population. This will increase costs for the NHS.

- Widening the A582 will not provide a solution as it is the numerous major junctions located along the route that determine average traffic speed. Dualling parts of the road will have little impact, and parts of the route subject to the worst congestion are currently dualled with key junctions already upgraded. Providing an additional traffic light controlled junction to access to the Lanes will further weaken the case for A582 widening.

- The A582 widening is also prohibitively expensive (£120+ million) and is likely to provide very poor taxpayer value for money, so DfT funding through the MRN programme appears unlikely. Funding from the Preston City Deal is highly unlikely as the infrastructure programme is in considerable deficit (minus £100 million) and the poor Governance and financial management of the programme is the subject of a recent complaint to the Local Government Ombudsman.

- The economic impact of the traffic delays on the A582 resulting from the committed development and the Lanes proposal has been quantified and the results are sobering. If the impact of delays on cars and HGV traffic is accounted for, and using Webtag recommended values of time, it is estimated that the committed development delays will cost the local economy £6.89 million per year.

- If the contribution to traffic delays from the Lanes development is added in, then the cost to the local economy rises to £12.39 million per year, with £5.5 million per year directly attributable to the Lanes. This cost penalty swamps any financial benefits listed in the Development supporting statement.

- The delays attributable to the committed developments and the Lanes significantly reduces the average speed on the A582, and therefore fuel efficiency drops. This

reduction in fuel efficiency and increase in traffic volume results in additional CO2 emissions and this annual increase in emissions of CO2 can be quantified.

- The CO2 emission resulting from committed development traffic delays is 4,627 tonnes per year. If the delays from the Lanes development is added in this results in an emission of 8,003 tonnes CO2 per year. In 2019 South Ribble produced 243,200 tonnes of CO2 from all transport sources. South Ribble has declared a climate emergency yet committed developments plus the Lanes could add 3.3% to this total.
- It should be noted that delays over the whole local road retwork impacted by this development will generate significantly greater economic cost and CO2 emission levels, with CO2 levels likely to exceed 10,000 tonnes per year.
- If South Ribble plan to offset the 8,003 tonnes additional CO2 emission rate it will need to plant 381,000 trees.

Review report contents

2 Introduction.

Following the submission of the two applications to SRBC in July 2021 the supporting Transport Assessment, Appendix 12.1 of the Masterplan has been reviewed. This Appendix is provided in the planning portal as a split document, with the first part referred to as TA1 and the second part referred to as TA2. The Transport Assessment was undertaken by a third party consultant Vectos.

In order to verify the conclusions reached in the TA document an analysis from first principles has been undertaken. All supporting data used in this analysis has been obtained from open source references. In particular a "Population Forecasting Study for New Dwellings" undertaken by Cognisant Research for Northamptonshire Country Council provides extremely useful data. Reference is also made to a report "New Housing Developments and the Built Environment" commissioned by Cambridgeshire and Peterborough NHS and Cambridgeshire County Council. Both reports provide data on population demographics appropriate for large new housing developments.

The approach in this analysis is to firstly evaluate population demographics likely to arise from the committed developments in the area, and from this specific planning application.

From the resulting demographics a review of the supporting infrastructure was made in particular the availability and capacity of local schools and the provision of GP services.

From an evaluation of demographics the likely trip generation rates are calculated for each sector of the population. Use is made of NTS reports and other surveys to profile the modal split for each sector.

For the purpose of this analysis the distribution of trips throughout the twelve hour analysis period was adopted as for the Vectos analysis.

The impact of this revised trip profile was estimated on the assumption that traffic delay time is directly proportional to trip rate and traffic flow.

The resulting revised delay times and anticipated traffic flows in particular for route 1, which is the A582 from the Tank roundabout to the Penwortham Triangle, have been used to evaluate a traffic delay cost attributable to the dependent developments and the proposed planning application.

Value of time metrics as proposed by Webtag 2014 for the evaluation of road schemes have been employed to monetise resulting delays.

The estimated delays and traffic flows have also been used to calculate CO2 emission rates directly attributable to committed developments and the planning application. Open source literature providing data on vehicle fuel efficiency as a function of vehicle speed has been used in this analysis.

Examination of the Vectos methodology has resulted in some worrying inconsistencies. In particular

- Failure to supply any data on how the various scenarios studied impact on the traffic flow values on the local roads network in particular for the am and pm peak hours.

- Failure to evaluate the development site demographics, leading to gross underestimation of commuting, education and leisure trips.

- When the multi modal trip demand data given in tables 6.5, 6.7, 6.8 and 6.9 of TA1 is summed for the full twelve hour analysis period total arrivals and departures do not align. This is particularly worrying for education trips, given in table 6.8, where over twelve hours there are 330 trips departing from the application site by car (1,100 homes) and only 238 trips returning. For table 6.9 detailing modal split for leisure trips 873 trips arrive on site as a passenger, and 48 depart? This appears to be a systemic error in the model.

- The journey time validation data given in table 17 and 19 for routes 1 and 3 appear to show a significant difference between observed journey times as indicated and derived from TomTom output, and the journey times when observed by Google maps? With the Tom Tom data used by Vectos appearing to significantly underestimate "observed" peak hour journey time when compared with Google maps.

- The assumption made by Vectos that 50% of all leisure trips occur within the planning application site and are therefore not accounted for is not supported nor justified.

- The assumption is made that there are many local schools in the area within walking distance of the site, thus reducing car dependency, yet no attempt is made to establish if any of the local schools will have the capacity to accommodate for the anticipated site demand.

- It is assumed that the local bus corridor along the B5254 will provide a regular and frequent service, thus reducing car dependency . This road corridor is heavily congested at peak periods and new and permitted development in the vicinity will make congestion worse. The reliability of the service is questionable and it is not uncommon for bus services serving Preston to be withdrawn because chronic car dependency and the resulting congestion makes the timetables unreliable. Several examples are given in Reference 1

This analysis has found that the Vectos Transport assessment is deeply flawed and grossly underestimates the adverse impacts of the Lanes development.

3 Development Demographics; 1100 homes

Reference 2 provides data on population demographics as a function of property type and bedroom number. Data is also provided for the demographic impact of social housing. The data set includes a range of new developments built in Northamptonshire.

For the Lanes it is assumed that the property mix is 10% two bedroom, 50% is three bedroom and 40% is four bedroom.

It is stated in the Development Supporting Statement Document paragraph 9.2 that the development has a working age population of 1850 (16+ to 64).

Reference 2 also provides a profile of child age group per dwelling per bedroom number .

Table 3.1 Childen by age distribution as a function of bedroom number

Number of bedrooms in dwelling	1	2	3	4
Pre School Children	0	0.30	0.32	0.34
Primary School Children	0	0.13	0.32	0.37
Secondary School Children	0	0.03	0.17	0.22
Post 16's	0	0.03	0.07	0.09

Reference 2 also provides a profile of child age per dwelling per bedroom number for social housing.

Table 3.2 Children by age distribution as a function of bedroom number for social housing

Number of bedrooms in dwelling	1	2	3	4
Pre School Children	0	0.52	0.63	0.92
Primary School Children	0	0.19	0.83	0.58
Secondary School Children	0	0.04	0.41	1.00
Post 16's	0	0.05	0.19	0.58

Assuming the same housing profile as above namely 10, 50 and 40% for 2, 3 and 4 bedrooms, and assuming the development consists of 30 % social housing the number of children and their age profile can be determined.

Firstly the Child profile was calculated for the 70% non-social housing totalling 0.7x1100=770 dwellings.

Table 3.3 Child age group distribution non-social housing

Number of bedrooms in dwelling	1	2 (10%)	3(50%)	4(40%)	Total by age group
Pre School Children	0	23	123	104	250
Primary School Children	0	10	123	114	247
Secondary School Children	0	2.3	65	68	135.3
Post 16's	0	2.3	26.5	28	56.8
Totals by bedroom number	0	38	338	314	

The profile is then calculated for the social housing totalling 0.3 x 1100=330 dwellings

Table 3.4 Child age group distribution social housing

Number of bedrooms in dwelling	1	2 (10%)	3(50%)	4(40%)	Total by age group
Pre School Children	0	17.2	104	122	243.2
Primary School Children	0	63	137	76	276
Secondary School Children	0	13	68	132	213
Post 16's	0	17	32	76	125
Totals by bedroom number	0	110	341	406	

It is therefore concluded that the number and age profile for child occupants is as follows

Totals by age grouping

Pre-School = 23+123+104+17+104+122 = 493

Primary School = 10+123+114+63+137+76 = 523

Secondary School = 2.3 +26.5+65+13+68+132 = 307

Post 16's = 2.3+26.5+28+17+32+76 = 182

Total number of children = 1505

Total number of children excluding post 16's =1323.

Total number of occupants 0-64 years of age =1323+1850=3173

To establish the population of 65+ age group Reference 3 provides age demographics for a number of new developments in Cambridgeshire. It indicates that the population of 65+ residents is approximately 13% of the development population. This yields a figure of 470 residents over 65, providing the following measure of total population for a 1,100 home development with 30% social housing.

16-64 age =1850

Pre school = 493

Primary School = 523

Secondary School=307

65+ age population =470

Total population estimate = 3,643

For the same development with no social housing the total population reduces to 3,203

For a similar development of 1,350 dwellings and 30% social housing the population increases to

(1350/1100) x 3643 = 4,481

4 Schools in the catchment

The Vectos TA claims that a modal shift in travel will occur as many education facilities are located within walking distance of the development, and a large proportion of education trips will be on foot.

In particular a number of schools were listed as being in the immediate catchment. In table 2.2, page 15, Vectos TA 1 is a list of primary and secondary schools in the catchment.

Considering the primary schools first, the following information has been found by accessing the school websites

Primary School claimed distance from site, pupil numbers and capacity

Table 4.1 Local primary schools distance from site, current pupils and capacity.

	Pupils	Capacity	Difference
Kingsfold Primary; 1080m	120	210	90
Our Lady and St Gerrards, 1190m	343	378	35
Penwortham Broad Oak ,1510m	187	210	23
Middleforth Primary, 1900m	208	210	-
Lostock Hall Community Primary, 2400m	425	420	-
Nominal spare capacity			148

Permitted developments in Longton, Hutton, Hoole, Howick and new Longton <1 mile away =127

Permitted developments at the Gas Works and Penwortham Mills <1.5 miles = 633

Permitted developments in Faringdon/Croston Rd/Moss lane ~ 2 miles = 600

Source Vectos TA and Reference 4

Assuming that these permitted developments do not include social housing the primary school demand is anticipated to be (127+633+600)x247/770=436 primary school places.

Unless there is a radical and immediate primary school building programme there appears to be insufficient primary schools to accommodate the permitted development demand. It

appears likely that there will be ***no available primary school capacity*** for "the Lanes" within a 2 mile radius for the foreseeable future as the Lanes at 1100 dwellings requires 523 primary school places. It is not clear if the responsible authorities are aware of this situation, and what provisions if any have been made. The infrastructure delivery plan does not identify when the two form entry primary will be completed, however the TA assumes places are available when and if the site is extended to 1350 homes.

Table 4.2 Secondary School claimed distance from site, pupil numbers and capacity

	Pupils	Capacity	Difference
Penwortham Girls High School 2700m	769	744	-
Lostock Hall Academy 3000m	612	800	188
All Hallows Catholic High School 3000m	900	890	-
Penwortham Priory Academy 3800m	747	1152	405
Nominal Spare capacity			593

Permitted developments in Longton, Hutton, Hoole, Howick and new Longton <1 mile away =127

Permitted developemts at the Gas Works and Penwortham Mills <1.5 miles = 633

Permitted developments in Faringdon/Croston Rd/Moss lane < 2 miles = 600

Source Vectos TA and Reference 4.

Assuming that these permitted developments do not include social housing the Secondary school demand is anticipated to be (127+633+600)x135/770=238 Secondary School places.

Nominal Secondary School capacity remaining after accounting for permitted developments=355 with a Secondary School place demand from the Lanes of 270 places.

It also appears that parents will effectively have only one "local" Secondary School with any remaining capacity namely Penwortham Priory, this will severely limit parent choice. This may also be a severe constraint to families from some ethnic or faith backgrounds.

Nursery/Pre-School Provision.

It appears that this key educational requirement has not been considered by Vectos in their estimation of Trip generation yet for New Housing developments this is a key consideration. For the Lanes at 1100 dwellings it is estimated that there will be 493 pre-school age resident children.

It is unclear how much local nursery capacity will be available locally for the Lanes development. Reference 5 indicates that 62% of nursery age children are in formal childcare, therefore there is a demand for 306 nursery places within the catchment. It is unclear what if any planning provision has been made for this additional demand.

5 Health facilities in the catchment.

The Lanes development TA mentions one local medical facility at Kingsfold, 1500m from site. For developments containing no social housing the average weighted ratio of occupants to dwelling is 2.78. Reference 2

On this basis in the catchment there are 2367 committed developments with a population of 6580.

The Lanes population will add a further 3643 people to this total, raising the local population to in excess of 10,000. This is materially significant when compared with the current population of South Ribble which is ~110,000.

As this expansion of housing far exceeds the natural population demographics/growth for South Ribble as detailed in the evaluation of the Standard method for housing determination, it appears likely that a significant proportion of this population will be imported from outside of the region, and not displaced from within. This appears to be social engineering on a major scale.

A significant proportion of this population will be under 5's and over 65's which will impose a significant additional demand on local healthcare provision.

The average number of patients per GP has risen to 2087 in 2019 Reference 6. In South Ribble and Chorley in 2013 it was 1712 patients per GP Reference 7. On that basis it is likely that and additional 5+ GP's and supporting infrastructure including buildings and support staff will be needed to meet the future population demands that result from committed developments and the Lanes. Currently it appears that there is little spare capacity within the local health system to meet existing demand with GP numbers per head of population being lower than the average for England, namely 1315 patients per GP in 2013/14 Reference 8

It is not clear if this additional demand for health care provision is being addressed, nor is it clear that local health care providers are aware of the extent of this developing problem.

6 Development Trip Assessment and peak demand.

6.1 Assessment of Commuting Trips.

The population in the 16-64 age range was reported as 1850 by Taylor Wimpey in the Supporting Statement. Reference 9 employment statistics for South Ribble April 2020 to March 2021 indicate that 81% of the working age population are economically active.

Therefor it is concluded that 1499 residents in the age group 16-64 are working. The population of 65+ residents is 470.

The percentage of this 65+ age group in work is assumed to be 18%. Reference 9

The number of persons assumed to be working in this group is assumed to be 85.

Therefor the total site population assumed to be in work is 1499 + 85 = 1584 .

Vectos apply a 5% factor to this total to account for home working and inter-site working.(para 6.14 TA 1).

This reduces the working population to 1584 x 0,95 =1505 .It is assumed that each person undertakes a return trip to their place of work eg one departure and one arrival from/to home on site.

To assess the commuting transport mode by car/van Vectos apply a weighted percentage to account for commuting distance. They conclude that 43% of commuting trips are less than 5 km and 57% are >= 5 km . For the shorter commutes they claim 61% of trips are by car and van and for >=5 km the proportion increases to 70%.

It is believed that the Lanes and other similar large developments located close to the SRN are designed to be "dormitory" housing developments, with a significant proportion of residents working outside the South Ribble boundary. As explained previously the committed developments in the region far exceed the local housing demand and that a significant majority originate and work from outside the local boundaries.

This is also inferred by the percentage of commuting trips that depart between 7 and 8 am. This is evidenced in table 6.5, page 46, Vectos TA1 where departures by car are at a maximum between 7-8am with 185 departures compared with 123 departures in the following hour. A typical 5km commute will take 10 minutes.

As a result we have applied a more realistic weighting and assume that 65% of commute trips are >5km.

This results in a weighted percentage trips by car of 0.35 x 61+0.65 x 70 = 67%

Therefore the total number of departure commute trips by car per day =1505 x 0.67= 1008.

It is assumed a similar number of arrival trips will also be completed by car per day.

Table 6.5 TA1 was used to establish the proportion of commute departures in the am peak hours 7-8 and 8-9, and arrivals in the pm peak between 16-17 and 17-18.

For the am peak departures a total of 612 trips were accounted for by Vectos over 12 hours with 30.2% departing between 7-8 and 21% departing between 8-9. For the am peak arrivals a total of 545 trips were accounted for with 7.2% arriving between 7-8 and 6.2 arriving between 8-9.

For the pm peak arrivals a total of 545 trips were accounted for by Vectos over 12 hours with 17% arriving between 16-17 and 26% arriving between 17-18. For departures a total of 612

trips were accounted for with 7.8 % departing between 16-17 and 10.3 % departing between 17-18.

In this analysis an equal number of commute departures= 1008 and arrivals= 1008 are assumed over the twelve hour period the peak hour and commute flows are tabulated using the Vectos peak hour proportions above and compared with the Vectos estimated peak flow.

Table 6.1 Commute Trip peak hour analysis from site demographics vs Vectos

Commute am and pm peak period flows using proportions employed by Vectos table 6.5	This analysis (% increase relative to Vectos analysis)		The Vectos analysis	
	arrive	depart	arrive	depart
7-8	73 (+87%)	304 (+64%)	39	185
8-9	62 (+82%)	212 (+72%)	34	123
16-17	171 (+82%)	78 (+63%)	94	48
17-18	262 (+82%)	104 (+65%)	144	63

It is clear that Vectos have significantly underestimated Commuter trips from the development both for the cumulative twelve hour period and for the peak hours. It is also a concern that for the Vectos drive commute trips the cumulative arrivals and departures do not correlate with 612 departures and 545 arrivals?

Two way peak flows for the am peak between 8-9 indicate that a two way commuting car flow from/to the development of 274 (+75%) will be observed compared with a Vectos value of 157.

For the pm peak between 17-18 it is estimated that two way commuting flows from/to the development of 366 (+77%) will be observed compared with a Vectos value of 207.

6.2 Assessment of Education Trips

The assessment of trips is made by education category eg Pre-school, Primary and Secondary.

Pre School Trips

Starting with pre-school trip demand, as shown previously, there is estimated to be a pre-school age population of 493 residing at the Lanes.

Reference 5 indicates that 62% of these children will be in formal childcare. This is a total of 0.62 x 493 =306 children in childcare.

Reference 11 indicates that 73 % of the travel to childcare facilities will be by private vehicle.

Therefore 306 x 0.73 = 223 two way daily car trips required.

Primary School Trips.

It is estimated that there will be a population of 523 primary school age children resident at the Lanes.

Because all the local primary schools will be at full capacity the modal split for travel outside a 1 mile radius will be employed. The split values are given in table 6.6 of the Vectos TA1. This split indicates that 56% of primary school children will travel by car to their place of education.

Therefore 523 x 0.56= 293 two way daily car trips required.

Secondary School Trips.

It is estimated that there will be a population of 307 secondary school children resident at the Lanes.

As all secondary schools are located more than 1 mile away from site it is assumed that 56% will travel to and from their place of education my car.

Therefore 307 x 0.56= 172 two way daily car trips required.

Total Education Trips daily two way.

Pre –school	223
Primary	293
Secondary	172
Total	688

Assume over a twelve hour period 688 departures and 688 arrivals occur.

Table 6.8 Vectos TA1 was used to establish the proportion of commute departures in the am peak hours 7-8 and 8-9, and arrivals in the pm peak between 16-17 and 17-18.

For the am peak departures a total of 330 trips were accounted for by Vectos over 12 hours with 13% departing between 7-8 and 51% departing between 8-9. For the am peak arrivals a total of 237 trips were accounted for with 4% arriving between 7-8 and 19% arriving between 8-9.

For the pm peak arrivals a total of 237 trips were accounted for by Vectos over 12 hours with 10% arriving between 16-17 and 6% arriving between 17-18. For departures a total of 330 trips were accounted for with 4% departing between 16-17 and 2% departing between 17-18.

In this analysis an equal number of commute departures= 688 and arrivals= 688 are assumed over the twelve hour period the peak hour commute flows are tabulated using the Vectos peak hour proportions above and compared with the Vectos estimated peak flow.

Table 6.2 Education Trip peak hour analysis from site demographics vs Vectos

Education am and pm peak period flows using proportions employed by Vectos in table 6.8	This analysis (% increase relative to Vectos analysis)		The Vectos analysis	
	arrive	depart	arrive	depart
7-8	28 (+211%)	89 (+112%)	9	42
8-9	131 (+185%)	351 (+107%)	46	169
16-17	69 (+176%)	28 (+115%)	25	13
17-18	41 (+215%)	14 (+133%)	13	6

It is clear that Vectos have significantly underestimated Education trips from the development both for the cumulative twelve hour period and for the peak hours. It is also a concern that for the Vectos drive commute trips the cumulative arrivals and departures do not correlate with 330 departures and 238 arrivals?

Two way peak flows for the am peak between 8-9 indicate that a two way commuting car flow from/to the development of 482 (+124%) will be observed compared with a Vectos value of 215.

For the pm peak between 17-18 it is estimated that two way education flows from/to the development of 55 (+189%) will be observed compared with a Vectos value of 19.

6.3 Assessment of Leisure trips.

Categorisation as Leisure trips is somewhat of a misnomer. Vectos state in para 6.19 TA1 Leisure trips include " walking the dog, visiting friends, day to day shopping such as for a pint of milk, other shopping, personal business, holiday day trips etc"

The reality is that "Leisure trips" covers all forms of shopping, personal business such as for banking, health visits such as hospital and GP, dentist, post office, religious service, all day trips, holiday trips, visiting friends, trips for entertainment and sport.

Reference 12 indicates that the following leisure trips per person per year are made for the following categories;

All shopping	160
Personal business	60
Visiting friends	75

Day trips 50

Sport and entertainment 30

Total leisure trips (one way?) per person per year 375

Bizarrely Vectos assume that 50 % of such leisure trips will be within the site boundary and are therefore excluded from the calculation. No justification for this assumption is given.

For the purpose of establishing modal split Vectos assumed the same split as for commuting namely, assuming leisure trips >5km ref table 6.4. therefore 70% are by car.

Total trips per day per person= 375/365= 1.03

Assume that the trips are single way trips return trips per person = 0.52

Assume that the trip data relates mainly to the adult population= 1850 (16-64 yrs) +470 (65+ yrs)

Total number of two way leisure trips/day =0.52 x 2320 = 1206

Table 6.9 Vectos TA1 was used to establish the proportion of commute departures in the am peak hours 7-8 and 8-9, and arrivals in the pm peak between 16-17 and 17-18.

For the am peak departures a total of 412 trips were accounted for by Vectos over 12 hours with 6% departing between 7-8 and 9% departing between 8-9. For the am peak arrivals a total of 412 trips were accounted for with 41% arriving between 7-8 and 2% arriving between 8-9.

For the pm peak arrivals a total of 462 trips were accounted for by Vectos over 12 hours with 13% arriving between 16-17 and 14% arriving between 17-18. For departures a total of 412 trips were accounted for with 8% departing between 16-17 and 7% departing between 17-18.

In this analysis an equal number of commute departures= 1206 and arrivals= 1206 are assumed over the twelve hour period the peak hour commute flows are tabulated using the Vectos peak hour proportions above and compared with the Vectos estimated peak flow.

Table 6.3 Education Trip peak hour analysis from site demographics vs Vectos

Leisure am and pm peak period flows using proportions employed by Vectos in their table 6.9 TA1	This analysis (% increase relative to Vectos analysis)		The Vectos analysis	
	arrive	depart	arrive	depart
7-8	12 (+140%)	72 (+177%)	5	26
8-9	24 (+140%)	108 (+184%)	10	38
16-17	157 (+153 %)	96 (+200%)	62	32

17-18	169 (+156%)	84 (+190%)	66	29

It is clear that Vectos have significantly underestimated Leisure trips from the development both for the cumulative twelve hour period and for the peak hours. It is also a concern that for the Vectos drive commute trips the cumulative arrivals and departures do not correlate with 412 departures and 462 arrivals?

Two way peak flows for the am peak between 8-9 indicate that a two way commuting car flow from/to the development of 132 (+175%) will be observed compared with a Vectos value of 48.

For the pm peak between 17-18 it is estimated that two way commuting flows from/to the development of 253 (+ 166 %) will be observed compared with a Vectos value of 95.

Bizarrely in the Vectos TA1 table 6.9 under the heading passenger/taxi mode the arrivals over 12 hours total 873 and the departures total 48. There appears to be a systemic error in the way modal trip demand is estimated in the Vectos analysis.

Table 6.4 Total Peak hour car trips by all purposes 1,100 homes The Lanes

Total Trip demand summary 1100 homes										
Travel hour	Commute		Education		Leisure		Total 1 way		Total 2 way	Total 2 way Vectos
	arr	dept	arr	dept	arr	dept	arr	dept	(difference as %)	
7-8	73	304	28	89	12	72	113	465	578 (+68%)	345
8-9	62	212	131	351	24	108	217	671	888 (+78%)	499
16-17	171	78	69	28	157	96	397	202	599 (+61%)	372
17-18	262	104	41	14	169	84	472	202	674 (+61%)	418

Table 6.5 Total Peak hour car trips by all purposes 1,350 homes The Lanes

Total Trip demand summary 1350 homes										
Travel hour	Commute		Education		Leisure		Total 1 way		Total 2 way	Total 2 way Vectos
	arr	dept	arr	dept	arr	dept	arr	dept	(difference as %)	
7-8	90	372	34	109	15	89	139	570	709 (+75%)	405
8-9	76	261	161	432	30	133	267	826	1093 (+104%)	536
16-17	210	96	85	34	193	118	488	248	736 (+66%)	444
17-18	322	128	50	17	208	103	580	248	828 (+63%)	507

7 Committed Development Trip assessment and peak demand.

The committed developments to be considered are given in Table 1 of the Vectos TA2

Table 7.1 Committed developments employed in the Vectos TA

ID	Name	Dwellings	Employment space m2
1	Croston Road	174 (350)	N/A
2	Croston Road North	400	N/A
3	Penwortham Mills	385	N/A
4	Gas Works	248 (281)	N/A
5	Cuerden	210	205,600
6	Test track	950	28,000

7.1 Considering the impact of the dwellings first, assuming no social housing provision.

The provision of social housing mainly impacts the population statistics for children per household. Note if social housing numbers are significant for permitted developemts this caclculation is likely to be an underestimate.

Total committed dwellings =174+400+385+248+210+950 = 2367.

For the lanes at 1100 dwellings and no social housing the population is estimated to be

16-64 age = 1850

Pre school = 357

Primary School = 353

Secondary School = 193

65+ age population = 430

Total population estimate = 3183

For the committed developments it is assumed that similar demographics to the Lanes are valid.

Therefor the trip profile per dwelling is considered to be similar, and the proportion of trips distributed throughout the twelve hour period is also considered similar.

Therefore the committed development population is

16-64 age =1850 x 2367/1100 = 3980

Pre-school =357 x 2367/1100 = 768

Primary school =353 x 2367/1100 = 760

Secondary School = 193 x 2367/1100 = 415

65+ age group = 430 x 2367/1100 = 925

Total population = 6848

The total trip demand for the Lanes at 1100 dwellings is used as the basis for estimated committed development trip profile. The trip profile is then adjusted to reflect the lower demand for education trips as a result of the assumption of zero social housing,and is then scaled in the ratio of the total population of the committed development relative to the total population of the Lanes.

Table 7.2 The Lanes trip demand no social housing.

Total Trip demand summary Lanes 1100 Dwellings no social housing										
Travel hour	Commute		Education		Leisure		Total 1 way		Total 2 way	
	arr	dept	arr	dept	arr	dept	arr	dept		
7-8	73	304	19	60	12	72	104	436	540	
8-9	62	212	89	238	24	108	175	558	733	
16-17	171	78	47	19	157	96	375	193	568	
17-18	262	104	28	10	169	84	459	198	657	

The trip data above is scaled in the ratio of population, scaling factor =6848/3183 = 2.15

Table 7.3 Committed development trip demand scaled from the Lanes analysis

Total Trip demand summary Committed development 2367 dwellings										
Travel hour	Commute		Education		Leisure		Total 1 way		Total 2 way	
	arr	dept	arr	dept	arr	dept	arr	dept		
7-8	157	654	60	191	26	155	243	1000	1243	
8-9	133	456	282	755	52	232	467	1443	1910	
16-17	368	168	148	60	157	206	673	434	1107	
17-18	563	224	88	30	363	181	1014	435	1448	

7.2 Consider the impact of commercial floor space on trip demand.

The Cuerden site has planning consent for 205,600 m2 and the test track site has consent for 28,000 m2. The Cuerden site has permission for 210 houses.

To extract the trip rates assigned to the commercial development the Cuerden site trip rate data given in table 5 and 6 of TA2 was employed to extract this data by difference.

To establish the Cuerden trip contribution from housing the total committed development trips tabulated above were scaled down in the ratio of 210/2367 = 0.089.

Table 7.4 Establishing Cuerden commercial trip demand by difference.

Evaluation of commercial site trips using Cuerden data given in table 5+6 of TA2						
	For 210 dwellings scaled From table above		Total trips from Cuerden site Tables 5+6		Commercial trip contribution by difference	
	arr	dept	arr	dept	arr	dept
7-8	21	89	264	221	243	132
8-9	42	128	648	418	606	290
16-17	60	39	469	1467	409	1428
17-18	90	39	418	653	328	614

The Commercial trip contribution for Cuerden, at 205,600 m2 is scaled down to provide the commercial contribution from the test track development at 28,000 m2.

Table 7.5 Test Track commercial trip demand by scaling from Cuerden.

	Cuerden Commercial trips for 205,600 m2		Test track site commercial trips for 28,000 m2; factor 0.136		Total Commercial Trips for both sites	
Travel hour	arr	dept	arr	dept	arr	dept
7-8	243	132	33	18	276	150
8-9	606	290	82	39	688	329
16-17	409	1428	56	194	465	1622
17-18	328	614	47	84	375	698

8 Impact on the A582, 1100 home development with committed development.

Table 8.1 Summary of total trips for the Lanes plus Committed development.

Total Trips the Lanes 1100 homes plus committed development trips; Local Road Impact									
	The Lanes 1100 homes			Committed development homes and commercial			Total trips		
	arr	dept	2 way	arr	dept	2 way	arr	dept	2 way
7-8	113	465	578	519	1150	1669	632	1615	2247
8-9	217	671	888	1155	1772	2927	1372	2443	3615
16-17	397	202	599	1138	2056	3194	1535	2258	3793
17-18	472	202	674	1389	1133	2522	1861	1335	3196

Comparison is now made with the data given in Vectos TA2 tables 5+6 with the data calculated in table 8.1 above.

Table 8.2 Comparison of committed development trips; this analysis vs Vectos

	Total 2 way trip Generation Committed Development		
time	This analysis	Vectos	Factor
7-8	1669	1198	1.39
8-9	2927	2250	1.30

16-17	3194	3006	1.06
17-18	2522	1844	1.37

Vectos TA2 table 7.2 shows the Vectos estimated delays on Route 1 on their network model for North and South bound traffic flows. Route 1 is the A582 between the Tank Roundabout and the Penwortham Triangle.

Scenario 2 is the 2031 base estimated flow plus the committed developments and Scenario 3 is the 2031 base plus committed developments plus the Lanes development at 1100 homes.

It can be seen from Vectos TA2 table 7.2 that the average two way delay (average of north and southbound delays) at the am peak (8-9) for the committed development scenario is 407 seconds, and for the committed development plus the Lanes development at 1100 homes this increases to 510 seconds.

Table 8.2 above shows that Vectos have underestimated the committed development two way flow at the am peak by 30%.

Similarly table 6.4 above shows that the impact of the Lanes development trips at the am peak has been underestimated by 78%.

A similar analysis can be undertaken for the pm peak (17-18)

Assuming that there is a linear relationship between trip numbers and traffic delays which is a conservative position to take, then the estimated delays in the vectos TA1 table 7.2 is revised as follows.

Table 8.3 Revised traffic delays on A582 route 1 to account for Vectos trip demand underestimate.

Revised am peak delays for the A582 (route 1)			
	Scenario 2 2031 base plus CD	Scenario 3 2031 base plus CD plus the Lanes	Difference attributable to the Lanes 1100 homes
Vectos average delay, 2 way	407 sec (6.8 min)	510 sec (8.5 min)	103 sec (1.7 min)
Factor to account for Vectos trip rate underestimation	1.3 (table 8.2 above)	1.78 (table 6.4 above)	
Revised average delay, 2 way	529 sec (8.8 min)	908 sec (15.1 min)	379 (6.3 min)

Revised pm peak delays for the A582 (route 1)			
	Scenario 2 2031 base plus CD	Scenario 3 2031 base plus CD plus the Lanes	Difference attributable to the Lanes 1100 homes
Vectos average delay, 2 way	437 sec (7.3 min)	544 sec (9.1 min)	107sec (1.8 min)
Factor to account for Vectos trip rate underestimation	1.37 (table 8.2 above)	1.61 (table 6.4 above)	
Revised average delay, 2 way	599 sec (10.0 min)	876 sec (14.6 min)	277 sec (4.6 min)

These revised delays are significant and economically and environmentally damaging when compared with the current journey time on the A582 from the tank roundabout to the Penwortham Triangle which according to Google maps varies from 7 minutes off peak to typically 10-11 minutes during peak hour traffic flow.

The economic cost to the region will be significant and is calculated in section 9 below.

The delays will significantly increase the emission of CO2 into the environment over the next decades and further reduce air quality in the region. This impact is quantified in section 10 below.

Let us now consider how these trips assigned to the A582. Consider only those developments that are located immediately adjacent to the A582 namely;

- Croston Road Hetherleigh Moss lane 600 homes
- Cuerden 210 homes plus 205,600 m2 commercial floorspace
- Test track 950 homes plus 28,000 commercial floorspace

By scaling the total committed housing development trips in table 7.3 the trip contribution from housing can be found. To this can be added the trip contribution from commercial floor-space to provide the total trips generated from each committed development adjacent to the A582.

Table 8.4 Total trip generation from committed developments adjacent to the A582

	Croston Road 600 homes		Cuerden 210 homes plus 205,600 m2 commercial				Test Track 950 homes plus 28,000 m2 commercial			
	Housing trips		Housing trips		Commercial trips		Housing trips		Commercial trips	
	arr	dep	arr	dep	arr	dep	arr	dep	arr	dep
7-8	61	253	22	90	243	132	97	410	33	18
8-9	118	365	42	130	606	290	187	379	82	39
16-17	170	110	61	39	409	1428	270	174	56	194
17-18	257	110	91	39	328	614	407	174	47	84

In order to assign a suitable proportion these two way flows to the A582 the following broad assumptions were made;

- For the Test Track two way flow 90% reports to Flensburg Way South of the Tank Roundabout. At the tank Roundabout 45% reports to the A582 to/from Preston. The remaining 45% reports to the A582 towards the M6. The balance 10% of two way Test Track trips report to/from Leyland.
- For the Croston Road two way flow it is assumed that 100 % reports to Flensburg Way where at the tank roundabout 50% reports to/from Preston on the A582. The remaining 50% reports to the A582 towards the M6.
- For Cuerden two way flow it is assumed that it is assigned 40% fo/from the direction of the M6, 30% is assigned to/from the A6, and 30% is assigned to/from Preston on the A582.
- For the Lanes trips it is assumed that 100% of the two way trips report to the A582.

On this basis;

The total two way flow on the A582 at the am peak in the vicinity of the Lanes site entrance is therefore;

(1068 (Cuerden) x 0.3) + (697 (Test track) x 0.45) +(483 (Croston Road) x 0.5) + 888 (the Lanes) = 1763 two way trips am peak

To place this flow into context the total observed two way flow measured on the A582 in 2018 in the vicinity of the Lanes site entrance was 2125 two way flows at the am peak. Reference 13

Therefor the Lanes at 1100 homes plus the committed developments will increase A582 traffic flow by 83% relative to current conditions at the am peak. For 1350 homes the traffic on the A582 will increase by 93% relative to current conditions at the am peak.

The anticipated increase in flow is likely to produce catastrophic traffic congestion on the A582 and surrounding local roads

A582 Dualling will not solve the problem..

The option of dualling the A582 will have little impact on delays as it is obvious that the traffic flow rate on the A582 is primarily determined by the number of closely located traffic junctions. Adding in another traffic light controlled junction between Pope lane and Chainhouse lane to serve the Lanes development will make widening an even more futile and expensive exercise.

It is also clear that there appears to be no source of funding to complete the A582 widening.

Because the project requires extensive bridge works it is likely that the project will cost in excess of £120 million with the Preston City Deal providing £70 million and the DfT providing £50 million. The DfT funding is uncertain as the scheme is likely to demonstrate poor Taxpayer value for Money.

The problem for the Preston City deal is that the finances are in a deficit position, with a current committed deficit of £100 million. Providing a further £70 million to fund the A582 Widening will be considered financially unsustainable.

The poor financial conduct of the Preston City Deal and lack of effective governance is also the subject of a recent complaint to the Local Government Ombudsman which is currently under investigation.

The impact of the A582 junctions on traffic speed is well illustrated in the diagram below which shows recent measured values of traffic speed. This graphic was extracted from the LCC SOBC for the A582 Widening Project Reference 14. The diagram shows the impact on Northbound traffic but the same pattern also exists for the South Bound traffic. Note the classic saw-tooth speed profile, and requirement for multiple acceleration and deceleration cycles. This sawtooth profile generates high levels of pollutants. Also note that the A582 in the vicinity of Stanifield Lane to the M6 is currently dualled and most major junctions have already been upgraded..

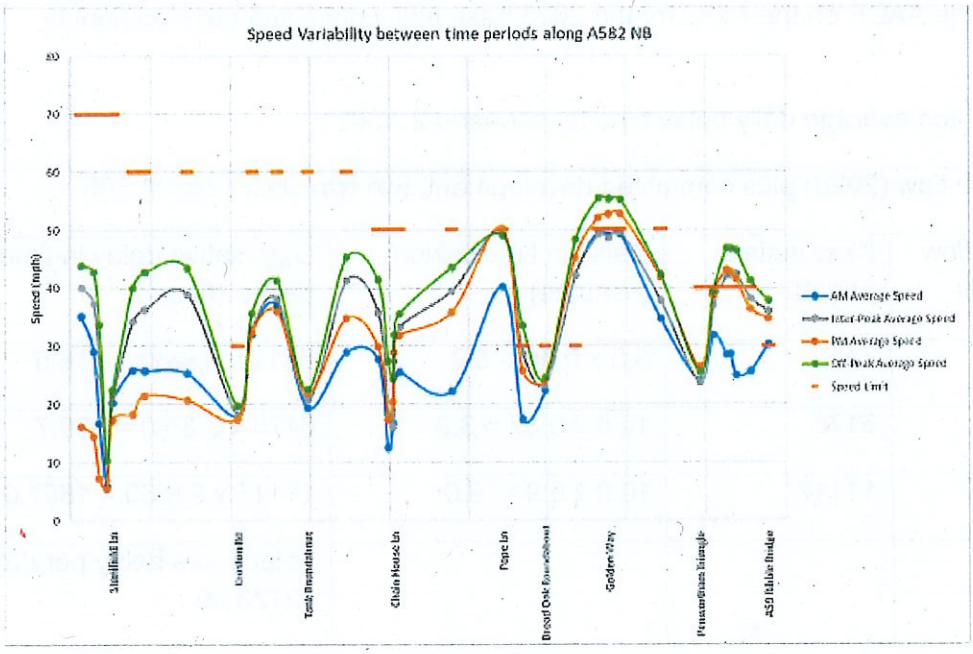

Figure 1 Currently Observed traffic speed variation A582 NB

9 Revised estimation of delay time and economic impact for A582 (route 1).

The following is a calculation to monetise the impact the revised delays identified in table 8.3 will have on the local economy.

From table 6.14 in the Vectos TA1 the percentage of two way flow assigned to each hour in the twelve hour time span is established for the Lanes at 1100 homes.

It is found that that

- 30 % of all two way trips occur between 7.00 and 10.00 am. Assumed average delay 66% of am peak
- 25% of all two way trips occur between 10.00 am and 15.00 pm. Assumed average delay 33% of the pm peak
- 45% of all two way trips occur between 15.00 pm and 19.00 pm. Assumed average delay 90% of the pm peak

Table 3.2 in the SOBC for the A582 Reference 14 provides current traffic data for the A582, compared with congestion reference flows for the road. It shows that the modelled current flow (2020) is 18,872 AADT two way, with a congestion reference flow of 22,000.

If the am peak flow assumed for the committed development and the Lanes at 1100 homes is assumed to be 15 % of the daily total then the total two way flow on the A582 Penwortham Way is estimated to be 1763/0.15 = 11753 + 18872 (2020 base) =30,625 AADT.

Next a weighted delay time is calculated for scenario 2 and 3 for the period 7 am to 7 pm.

For scenario 2 the AADF on the A582 for the 2020 base plus committed development is 24,705.

Table 9.1 Weighted average daily delay time for scenario 2 A582

Scenario 2 Base flow (2020) plus committed development; two way daily flow 24,705				
Time period	% flow split	Flow in time period	Delay in time period (minutes)	Cumulative delay in time period (hours)
7-10	30	7412	8.8 x 0.66 = 5.8	7412 x 5.8/60 = 716.5
10-15	25	6176	10.0 x 0.33 = 3.3	6176 x 3.3/60 = 339.7
15-19	45	11117	10.0 x 0.9 = 9.0	11117 x 9.0/60 = 1667.6
				Total hours delay per day =2723.80

For scenario 3 the AADF on the A582 for the 2020 base plus committed development plus the Lanes at 1100 homes is 30,625.

Table 9.2 Weighted average daily delay time for scenario 3 A582

Scenario 3 Base flow (2020) plus committed development; two way daily flow 30,625				
Time period	% flow split	Flow in time period	Delay in time period (minutes)	Cumulative delay in time period (hours)
7-10	30	9188	15.1 x 0.66 = 9.97	9188 x 9.97/60 = 1526.74
10-15	25	7656	14.6 x 0.33 = 4.82	7656 x 4.82/60 = 615.03
15-19	45	13781	14.6 x 0.9 = 13.14	13781 x 13.14/60 = 3018.03
				Total hours delay per day =5159.80

Reference 15 provides Webtag 2014 value of time data employed in road scheme economic appraisal.

The rates are as follows;

- Commuting £7.62 / hour
- Business £24.43 / hour

- Non work travel £ 6.77 / hour

From NTS 2020 the approximate split for car travel trips by purpose is as follows;

- Commuting 15%
- Business 3%
- Non work related 82%

Thus a weighted value of time of £7.43 per hour is applied to the delays given in table 9.1 and 9.2 above.

It is also assumed that the delays estimated above apply mainly to working days, and it is assumed that there are 256 working days in the year in England.

Therefore the cost of delays to the local economy in 2014 prices, just for the A582 Route 1 are as follows;

Scenario 2 ; 2020 base plus committed development = 2723.8 hrs/day x £7.43 per hour x 256 working days per year =£ 5.18 million per year.

Scenario 3; 2020 base plus committed development plus the Lanes at 1100 homes = 5159.8 hrs /day x £7.43 per hour x 256 working days per year = £ 9.81 million per year.

To account for HGV delay costs assume HGV traffic accounts for 10% of the 2020 base flow of 18,872 two way trips per day ref table 7 and 8 of the Vectos TA2, and HGV accounts for 10 % of the commercial trips arising from the committed developments at Cuerden and Test Track, resulting in an additional HGV daily two way trip total of 405 and 55 respectively.

This makes a total of 2347 HGV two way daily trips both for scenario 2 and 3. Assuming that this flow is distributed as for cars and subject to the same delays and a value of time cost of £25.47 / hour, then the cost of HGV delays in scenario 2 is an additional £1.71 million and for scenario 3 an additional £2.58 million.

Therefore A582 Scenario 2 total cost of delays = £5.18 million + £1.71 million = £6.89 million

And the total cost of A582 Scenario 3 delays = £9.81 million + £2.58 million = £12.39 million

Cost to the local economy of travel delays on the A582 attributable to the Lanes development at 1100 houses = £5.5 million per year.

10 Traffic delays; Impact on CO2 generation, A582.

The impact of delays on CO2 generation is now calculated by establishing how vehicle fuel efficiency diminishes as a result of delays and reduced average speed. Reference 16 . This shows how car fuel efficiency changes as a function of vehicle speed and engine emissions standard.

Reference 17 also shows how HGV fuel efficiency changes as a function of vehicle speed. For this analysis it is assumed that a mid-weight range HGV namely 12 te rigid is a reasonable average HGV vehicle type.

Using the cumulative delays given in tables 9.1 and 9.2 above for scenario two and three the following CO2 generation rates are calculated for cars.

10.1 Scenario 2 additional CO2 generated from traffic delays.

A582 distance for route 1 is 4.7 km and observed average two way journey time is 347 s or 5.78 min, from Vectos tables 17 and 19 TA2

Therefore the average two way speed is 4.7 x 60 /5.78 = 48.8 km/hr (30.5 mph)

For scenario 2 the cumulative average daily delay time from table 9.1 is 2723.8 hours with an average daily two way vehicle flow of 24,705. Average delay per vehicle is therefore

2723.8 / 24705 =0.11 hr =6.6 min.

Therefore the average speed on route 1, A582 reduces to (4.7 x 60)/ (5.78+6.60) = 22.78 km/hr.

Fuel efficiency for current reported speed condition of 48.8 km/hr = 6 Litres/ 100 km. Reference 16

Fuel efficiency for scenario 2 at an average speed of 22.78 km/hr = 9.3 litres/100 km

Therefore daily fuel consumption current condition = 6/100 x 4.7 x18872 = 5322 litres

Fuel consumption scenario 2 = 9.3/100 x 4.7 x 24705 =10450 litres

Additional fuel cosumption resulting from committed development delays is 10450- 5322 = 5128 litres /day

Assume average density of fuel is 0.8 kg.litre and % w/w carbon in fuel is 87% then

Carbon combusted per day = 5128 x 0.8 x 0.87 =4103.3 kg/day

Assume 100% carbon converted to CO2 and 1 kg mol CO2 weighs 44 kg and 1kg mol carbon weighs 12 kg then CO2 released to the atmosphere = 44/12 x 4103.3 =15044 kg/day

CO2 released per year as a result of committed development delays = 15044 x 256/1000 tonnes per year = 3851.3 tonnes per year.

To account for HGV delays on CO2 emissions assume HGV traffic accounts for 10% of the 2020 base flow of 18,872 two way trips per day ref table 7 and 8 of the Vectos TA2, and HGV accounts for 10 % of the commercial trips arising from the committed developments at Cuerden and Test Track, and reporting to the A582, this results in an additional HGV daily two way trip total of 405 and 55 respectively, making a total of 2347 HGV two way daily trips both for scenario 2 and 3.

Assuming that this flow is distributed as for cars and subject to the same delays then the the contribution to CO2 generation as a result of delays for scenario 2 is calculated as follows;

Current speed on route 1, A582 = 48.8 km/hr. (section 10.1)

Average vehicle delay is 6.6 min and average speed for scenario 2 reduces to 22.78 km/hr.

Reference 17 gives the speed/ fuel efficiency curves for a mid-range rigid 12 tonne HGV.

The HGV total flow for the current condition is assumed to be 10% of 18872 =1887

The fuel consumption at 48.8 km/hr is 16 Litres/100 km.

Therefore average HGV fuel consumption for current road conditions per day = 16/100 x 4.7 x 1887 = 1419 litres.

For scenario 2 the speed reduces to 22.78 km per hour and the fuel efficiency reduces to 23 litres/100 km.

Therefore for scenario 2 HGV two way flow increases to 2347/day and the fuel consumption per day = 23/100 x 4.7 x 2347 = 2537 litres.

Assuming diesel fuel is consumed then the density is 0.85 kg/litre and the % carbon by weight is 87%.

Therefore scenario 2 delays result in an additional 2537- 1419 = 1118 litres being consumed on average by HGV's.

Using the same calculation method as above for scenario 2 HGV delays add a further 3031 kg CO2 per day or 776 tonnes CO2 per year.

Therefore scenario 2 committed developments delays result in an additional 3851+ 776 = 4627 tonnes/year of CO2 discharged to the environment.

10.2 Scenario 3 additional CO2 generated from traffic delays

Employing the same methodology as for section 10.1 the average delay now increases to 5159.8/ 30625 = 10.11 min from table 9.2 above.

The average vehicle speed reduces to 4.7 x 60 / (5.78 + 10.11) = 17.75 km/hr.

At this speed the fuel efficiency for an average car drops to 10.1 litres / 100 km. Reference 16

Daily fuel consumption for scenario 3 = 10.1/100 x 4.7 x 30625 =14537.7 litres

Daily additional fuel consumption resulting from scenario 3 delays = 14537.7 – 5322 =9215.7 litres.

Equivalent CO2 generation rate = 6921 tonnes /year

Additional contribution from delays experienced by HGV's;

Mid range HGV fuel consumption at 17.75 km/hr is 27 litres /100 km. Reference 17

Daily fuel consumption = 27/100 x 4.7 x 2347 = 2978 litres.

Therefore scenario 3 delays result in an additional 2978- 1419 = 1559 litres being consumed on average by HGV's.

This is equivalent to 1082 tonnes per year.

Therefore traffic delays resulting from scenario 3 committed developments plus the Lanes at 1100 homes produce an additional 6921 + 1082 = 8003 tonnes/year of CO2 discharged to the environment.

To put this figure into context South Ribble is estimated to generate 243200 tonnes of CO2 per year from transport in 2019 Reference xx (LCC Carbon Dioxide Emissions report 2019).

Committed developments plus the Lanes will increase this figure by 3.3%

Given that a tree can absorb 21 kg of CO2 per year it will require South Ribble to plant 381,000 trees to offset this additional CO2 generation. This will require approximately 38.1 square km of land.

11 Conclusion.

This analysis shows that the proposed Lanes development will have a major adverse impact on Social infrastructure. It appears that there will be no availability of primary school places from the onset of the development within two miles of the site.

The provision of Secondary School places will be under severe pressure will little or no parental choice in the catchment area.

It is doubtful if there will be sufficient formal pre-school facilities available in the catchment.

This absence of local education infrastructure will lead to increasing levels of car dependency and congestion.

There needs to be a significant investment in GP and medical facilities in the region in order to cater for the significant increase in local population that will result from the committed developments and the proposed Lanes Development. It is not clear if there are plans for such an investment to be made, and the absence of such investment will lead to a significant worsening of the quality of local healthcare provision.

It is not clear that the responsible authorities are aware of the magnitude of the infrastructure problem that will need resolution if the Lanes is permitted. It is not clear that the responsible authorities are fully aware of the impact of the committed developments, especially for the provision of education services.

It appears that Vectos have grossly underestimated the impact of car dependency that will result from the development by a staggering 78 %. The impact of traffic delays on the A582 will be catastrophic.

Although time pressures have limited our analysis to impacts on the A582 it is likely that such underestimates of traffic demand will also severely impact on the other local roads. In particular on the B5254 and the junctions with the SRN.

The economic impact of traffic delays to the region will be severe, with delays on the A582 alone resulting in an economic cost of £5.5 million per year. Note that delays throughout the network will add significantly to this total.

These delays will increase CO2 emissions to the atmosphere as traffic speed slows to a crawl on the A582, at 17.75 km /hr. CO2 emissions resulting from committed developments and the Lanes traffic delays on the A582 will add just over 8000 tonnes/years CO2 to the atmosphere.

If other delays in the local road network are also accounted for it is likely that total CO2 emissions will be in excess of 10,000 tonnes. This is not a good situation for a local council that has declared a climate emergency and has a current CO2 emission total from road transport of 243,000 tonnes per year. Reference 18.

12 References.

1. LCC transforming Cities Bid. November 2019.
2. Population Forecasting Study; Cognisant research for Northamptonshire County Council 2014.
3. New Housing Developments and the Built Environment; Cambridgeshire and Peterborough Clinical Commissioning Group and Cambridgeshire County Council. 2017
4. SRBC Housing Position Statement April 2020.
5. Childcare and Early Years Survey of Parents in England 2018 for the DfE.
6. Article in Pulse magazine July 2019
7. Lancashire Pharmaceutical needs Statement 2015
8. Lginform Website-Ratio of GP's per 10,000 population in England .
9. Nomisweb employment statistics for South Ribble.
10. Employment Statistics for Workers age 50 and over, by five year age bands and gender for DfW and P Nov 2015.
11. Exploring travel behaviour in households with pre-school children. Journal of the transportation research board January 24 2021.
12. UK Gov publishing service data file 131460/37-Chart 37 Trips by purpose NTS.
13. Croft Edison TA for the 2020 Lanes Masterplan
14. SOBC LCC A582 Widening Project July 2019 (redacted)
15. DfT Technical report; Provision of Market Research for Value of travel Time Savings and Reliability 15 August 2015. Arup.

16. Reduced Carbon and Energy Footprint in Highways Operations; The Highway Energy Assessment (HERA) Methodology.

17. Speed Emission/Energy curves for ultra-low emission vehicles. Ricardo AEA for the DfT 23 June 2015.

18. LCC document Carbon Emissions Summary 2019 Table 1; local and regional estimates for CO2 emissions

LCC Education statutory consultee response to the Lanes planning application 07/2021/00886/ORM

We have been reviewing the email response from the LCC Schools Planning group dated 8th October 2021 and the accompanying Education Contribution Assessment dated 17th September 2021.

We have a number of queries relating to the demand for primary school places arising from committed developments in the vicinity of the proposed site, and from the two planning applications 07/2021/00886/ORM and 07/2021/00887/ORM.

We have similar concerns regarding Secondary and Pre-school education provision.

- **Background information**

The committed developments considered to impact the proposed development are listed below. They were used in the transport assessment completed by Vectos

Committed developments employed in the Vectos TA

ID	Name	Dwellings	Employment space m2
1	Croston Road	174 (350)	N/A
2	Croston Road North	400	N/A
3	Penwortham Mills	385	N/A
4	Gas Works	248 (281)	N/A
5	Cuerden	210	205,600
6	Test track	950	28,000

Q1 Can LCC please confirm which of the committed developments listed above have been employed to predict the demand for primary and schools in the proposed development catchment?

Q2 under the section "Pupil Yield" there is reference made to a "detailed research project carried out during 2012" through which pupil yield is calculated for a bedroom mix within a development. Could LCC please provide a copy of this research paper?

- **Assessment of Primary School Pupil Yield**

LCC state that as the developer has not provided bedroom numbers for the development LCC apply a pupil yield appropriate for a four bedroom development.

The yield data employed for the four bedroom case is given below and extracted from the Education Contribution Assessment document.

Development details

Number of bedrooms	Yield applied per dwelling	Number of dwellings	Primary yield for this development
1	0.01		
2	0.07		
3	0.16		
4	0.38	920	349.6
5	0.44		
Totals		920	(349.6) 350 Places

As part of our research on the subject of new development population demographics we have found a number of useful references including this one;

"Population Forecasting Study; Cognisant research for Northamptonshire County Council 2014."

This was a comprehensive survey based research project with 2,985 addresses in new developments chosen at random using a mix of face to face interview and postal questionnaire to obtain the required information. The intent of the research was to establish robust Pupil Product Ratios (PPR's) in order to yield accurate numbers of school age children generated by a new housing development.

As a result of that research data has been produced on how many school age children are resident in a new development dwelling as a function of bedroom number and also how the provision of social or affordable housing changes this metric.

Cognisant research study; Childen by age distribution as a function of bedroom number

Number of bedrooms in dwelling	1	2	3	4
Pre School Children	0	0.30	0.32	0.34
Primary School Children	0	0.13	0.32	0.37
Secondary School Children	0	0.03	0.17	0.22
Post 16's	0	0.03	0.07	0.09

Cognisant research study; Children by age distribution as a function of bedroom number for social housing

Number of bedrooms in dwelling	1	2	3	4
Pre School Children	0	0.52	0.63	0.92
Primary School Children	0	0.19	0.83	0.58
Secondary School Children	0	0.04	0.41	1.00
Post 16's	0	0.05	0.19	0.58

As LCC are aware the application includes for the provision of 30% affordable homes. Using a suitably weighted "yield" to account for affordable homes given in the Cognisant research the following adjusted yield is apparent. 0.7 x 0.38 + 0.3 x 0.58 = 0.44.

As LCC are aware the total number of homes from the two planning applications is 1,100.

Therefore the total yield of primary school children accounting for the provision of 30% affordable housing and assumption of 100% four bedroom homes is 484 not 350.

It should also be noted that from the Cognisant research the maximum "yield" of primary school children actually occurs in three bedroom homes. The assertion made in the LCC response that the choice of four bedrooms for the analysis presents a worst case scenario is not true according to the Cognisant research.

In fact if a more realistic assumption of 10 % two bedroom, 50% three bedroom and 40% four bedroom split is made for the development, the population of primary school children for the 1100 home Lanes development increases to 523. This is significantly higher that the estimate made in your response.

Q3 In the light of our findings are LCC prepared to reconsider the response that appears to seriously underestimate primary school demand from the development by neglecting the impact of affordable housing.

- **Dependent Development; Impact on primary School places**

Your response identifies 26 primary school places taken by dependent developments. We are concerned that many of the primary schools listed in the response are in fact closer to a large 600+ home committed development being built off Flensburg Way/Croston Road and to a committed housing development at Penwortham Mills at 633 homes, than they are to the development site access road. It is also worth noting that the Test Track housing development at 950 homes is only located 2.5 miles from the proposed site entrance.

In addition there are many small committed housing developments, 127 in total, in the area of Hutton, Hoole, Longton, New Longton and Howick parishes that will also be competing for primary school places. They do not appear to feature in the list of approved or pending housing developments given in the response The committted developments are identified in the SRBC Housing Position Statement 2020.

These committed developments provide the potential for (600 + 633 +127) x 0.38 primary school children = 517.

Of the fifteen listed primary schools at least five are closer to large committed developments than to the development site so to take a prudent position this dependent development demand is reduced to one third eg 172 primary places

It is difficult to reconcile your figure of 26 primary places from dependent developments with the figure of 172 calculated above.

Q4 Given the demand for primary school places from committed developments in the catchment area of many of the primary schools listed, are LCC prepared to reconsider the

response that appears to seriously underestimate primary school demand from committed developments?

- **The impact of Population demographics in South Ribble and Preston.**

In your response it is argued that population data from the region indicates that for many of the primary schools listed pupil numbers decline in 2026 relative to the current roll.

We are struggling to reconcile this assumption with recent housing market assessments such as "Central Lancashire Strategic Market Assessment" by GL Hearn dated September 2017 which concludes that the population of South Ribble and Preston will grow by 2.9% and 3.1% respectively between 2014 and 2034. The Central Lancashire Housing study by Iceni dated October 2019 also indicates that household growth in South Ribble will increase by 3.3% from 2019 to 2029.

Q5 Given this data from two recent housing studies based on regional demographics are LCC prepared to reconsider the response that appears to contradict the findings of these studies by significantly reducing pupil numbers for many primary schools listed from current to 2026?

- ***Conclusion***

Our analysis indicates a serious shortfall in primary school places.

3985 places available as a result of school expansion

3698 roll number by assuming population of primary school children does not change (conservative)

Leaving a capacity of 287 places

Assume 172 primary places taken by local committed developments (conservative)

Leaves a total of 115 places available for the Lanes development

523 places required by the Lanes at 1100 homes and 30% affordable housing

Shortfall of 408 primary places.

This indicates that there may be a serious issue developing and we think this merits a thorough and comprehensive review, as the implications of getting this analysis wrong are profound.

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Privacy
- Size

Comment:In reference to the above planning applications I wish to object on the following grounds.

Cross Borough Link Road

.

The Local Plan 2012 to 2026 adopted in 2015 and The Core Strategy guidelines are not complied with i.e. It should be in place before construction of any new houses, it should directly connect The Cawsey and The A582 and it should be provided through
developer contributions.

-

The withdrawal of the planning application for the Cross Borough Link road shows it was only ever a cynical attempt to provide access to their proposed development, with no intention of ever completing it.

-

A future CBLR would meander through a huge development with many road junctions causing a not insignificant danger to the public, especially children.

-

A bridge over the west coast main line was always a requisite, now it seems it's just a distant

aspiration.

-

The western access is from the A582 which lacks traffic capacity and already has some of the highest AQM levels in the area.

-

The eastern access is proposed from a Tee junction to Bee lane, which is an inadequate single track road and very old narrow railway bridge. This would be totally unsuitable with one way priority traffic being held and backing up onto Bee lane roundabout and Leyland Rd.

-

Existing residents on Bee lane would have very restricted and often blocked access.

-

If the CBLR was ever completed and connected via a new west coast mainline bridge, we would have a ridiculous scenario of cross borough traffic meandering through a huge housing development causing a not insignificant danger to children and the public.

-

Flood Risk and Drainage

-

Having lived and worked on Bee lane for 40years I have first-hand knowledge of the land and drainage.

-

This area is known to flood regularly; It is boulder clay and has a very high water table. There is very little ground infiltration and surface water drainage is via a network of ditches and culverts (many unmapped) emptying into Mill brook and then into the River Ribble.

-

The flood risk assessment does not take into account the tidal and flood nature of the River Ribble and the backing up of the Mill brook tributary.

-

The report states that "existing septic tank outflows into ditches are to be retained". So that's over 40 existing properties feeding top water from septic tanks into ditches and newly created open attenuation ponds throughout the proposed development.

-

The report states that a pumping station will be built to pump the surface water further downstream into Mill brook. This will have the effect of moving the flood waters to another area.

-

Mill brook is not a United Utilities asset, so who is responsible for its maintenance?

-

The general public need planning permission to change their lawns to block paving or tarmac because of known increase in flood risk, yet a development of this colossal size is presumed to have little effect.

-

What assurance do we have as existing residents that our properties will not be flooded as a direct consequence of this preposterous development?

-

It is outrageous that the flood risk and drainage assessment is carried out on behalf of the developer. It most certainly should be done on behalf of SRBC and LCC, where I feel certain that the findings would be that this area is wholly unsuitable for a development on this scale.

-

The proposed development is only 360 metres from an area of flood risk zone 2/3 which is a tributary of the river Ribble.

-

Two pumping stations are proposed to pump sewage to Pope Lane and Kingsfold drive, both of which have been identified as having no extra capacity.

-

Several pumping stations to move surface and foul water will have a huge negative environmental impact.

-

The potential for the complex foul water and surface water systems to fail and become combined would be disastrous.

-

It would be nigh on impossible for house owners to get insurance due to the high flood potential of this development.

-

The National Planning Policy Framework clearly states; "To avoid inappropriate development in areas at risk of flooding and to direct development away from areas at high risk" May I suggest that SRBC heeds this very important advice.

Summary

-

The existing lanes are all single track roads and are not suitable for extra traffic.

-

The duelling of the A582 has not been completed and would make access to the site extremely dangerous.

-

Not providing a CBLR means policy A2 requirements i.e.: A road to be constructed between The Cawsey and the A582 will not be complied with.

-

Policy G17 design criteria for new developments would not be complied with i.e. the proposal should not have a detrimental impact on the existing neighbouring buildings.

-

Policy G5 As3 would not be complied with i.e. no area of separation between Lostock

Hall and Penwortham.

-

Loss of such a huge amount of green space is not acceptable.

-

The present infrastructure cannot cope with such a huge development.

-

Government and council policy is to plant more trees not cut down mature trees as would be the case here.

-

The traffic congestion and pollution levels in the area are already unacceptable and cannot cope with a huge inevitable increase.

-

The huge and inevitable negative environmental impact is unacceptable.

I reserve my position to submit further comments at a later date when more detail emerges.

Tyra Thompson

From: [redacted]
Sent: 31 October 2021 11:59
To: SRPlanning
Subject: For the attention of Janice Crook : Ref / Application A 07/2021 / 00886/ ORM and Application B 07/ 2021 / 00887/ORM I'm writing to object to these planning applications as proposed by Taylor Wimpey / Homes England for the following reasons ..

* the devt is to be imposed on an already existing community ... many residents (who do not have land to sell) have Not been consulted and will be subjected to many years of misery , living on a building site , properties devalued without any compensation.
* the developers themselves have chosen to call the development " The Lanes " and that's exactly what it is ..a network of country lanes enjoyed by many local people ..by definition a Lane is " a narrow road in a rural area " So not designed to cope with years of heavy builders traffic ... we had a taste of that with Brownfields Solutions (employed by the developers) where Bee Lane was frequently blocked by large articulated lorries and heavy drilling plant ..ancient hedgerows were ripped up so that they could gain access to fields as the Lane was just too narrow for them to manoeuvre ..
* there is no infrastructure in place (nor is there ever likely to be) for such a huge proposed devt ... The lanes are simply too narrow to cope with 1000 's of extra cars the new houses will inevitably engender , all funnelling onto the Leyland road (itself already massively congested) over Victorian railway bridges not fit for that purpose .. not to mention the increased air and noise pollution this upsurge of traffic will cause both to the existing and future community .. especially their children ...
* the whole area is given to extensive flooding (not once in 100years as the developers claim) but EVERY year , frequently.. Ask the residents who live here .. we have photographic evidence which we have shared with developers and councillors .. building on this floodplain would be immoral and further exacerbate the situation , subjecting existing householders and new house owners to very high risk of flooding in the future .
* the fact that this area was safeguarded for building 40 years ago is no longer an argument for it to go ahead now and for it not to be challenged..

The World has changed drastically ..and continues to do so .. this has to be acknowledged..
We , none of us , can ignore the impact of climate change (esp re flooding) but more importantly , the state of our present (and future) economy has to be a recognised factor (the effects of the pandemic must also be taken into account) before such a development can be given the "go ahead " ..
Questions must be asked when considering a devt of this scale , in this area ...
* Who will be able to buy these houses ? Will there even be any affordable houses ?
* Where will these new residents be employed ?
* Where will their children go to school (primary and high school) and will they be able to travel there safely ?
* Will there be enough Drs , Dentists , Police ?

Please let common sense prevail and accept that this proposal does not work for this unique area , it is ill timed and totally inadequate for the world we now live in..

Thankyou for the opportunity to have my say .. I have also sent a hard copy through the post ... yours sincerely [redacted]

Sent from my iPad

To/ planning@southribble.gov.uk
FAO Janice Crook

[redacted]

Reference/ Application A 07/2021/00886/ORM and Application B 07/2021/00887/ORM

In reference to the above planning applications I wish to object on the following grounds.

Cross Borough Link Road

- The Local Plan 2012 to 2026 adopted in 2015 and The Core Strategy guidelines are not complied with i.e. It should be in place before construction of any new houses, it should directly connect The Cawsey and The A582 and it should be provided through developer contributions.
- The withdrawal of the planning application for the Cross Borough Link road shows it was only ever a cynical attempt to provide access to their proposed development, with no intention of ever completing it.
- A future CBLR would meander through a huge development with many road junctions causing a not insignificant danger to the public, especially children.
- A bridge over the west coast main line was always a requisite, now it seems it's just a distant aspiration.
- The western access is from the A582 which lacks traffic capacity and already has some of the highest AQM levels in the area.
- The eastern access is proposed from a Tee junction to Bee lane, which is an inadequate single track road and very old narrow railway bridge. This would be totally unsuitable with one way priority traffic being held and backing up onto Bee lane roundabout and Leyland Rd.
- Existing residents on Bee lane would have very restricted and often blocked access.
- If the CBLR was ever completed and connected via a new west coast mainline bridge, we would have a ridiculous scenario of cross borough traffic meandering through a huge housing development causing a not insignificant danger to children and the public.
- Flood Risk and Drainage
-

Having lived and worked on Bee lane for 40years I have first-hand knowledge of the land and drainage.

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This area is known to flood regularly; It is boulder clay and has a very high water table. There is very little ground infiltration and surface water drainage is via a network of ditches and culverts (many unmapped) emptying into Mill brook and then into the River Ribble.

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The flood risk assessment does not take into account the tidal and flood nature of the River Ribble and the backing up of the Mill brook tributary.

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- The potential for the complex foul water and surface water systems to fail and become combined would be disastrous.
- It would be nigh on impossible for house owners to get insurance due to the high flood potential of this development.
- The National Planning Policy Framework clearly states; "To avoid inappropriate development in areas at risk of flooding and to direct development away from areas at high risk" May I suggest that SRBC heeds this very important advice.

Summary

- The existing lanes are all single track roads and are not suitable for extra traffic.
- The duelling of the A582 has not been completed and would make access to the site extremely dangerous.
- Not providing a CBLR means policy A2 requirements i.e.: A road to be constructed between The Cawsey and the A582 will not be complied with.
- Policy G17 design criteria for new developments would not be complied with i.e. the proposal should not have a detrimental impact on the existing neighbouring buildings.
- Policy G5 As3 would not be complied with i.e. no area of separation between Lostock Hall and Penwortham.
- Loss of such a huge amount of green space is not acceptable.
- The present infrastructure cannot cope with such a huge development.
- Government and council policy is to plant more trees not cut down mature trees as would be the case here.
- The traffic congestion and pollution levels in the area are already unacceptable and cannot cope with a huge inevitable increase.
- The huge and inevitable negative environmental impact is unacceptable.

I reserve my position to submit further comments at a later date when more detail emerges.

FEEDBACK ON PROPOSED PICKERINGS FARM DEVELOPMENT.07/2021/00886/ORM

Dear Sir / Madam,

I am writing to express my OBJECTION to the prorosed Pickerings Farm Development for the following reasons :

1) NO REQUIREMENT FOR ADDITIONAL HOUSING IN SOUTH RIBBLE, taking the proposed Pickerings Farm development and current developments in Leyland under consideration there is no requirement for additional housing in this area. There is already a large number of housing developments underway in the Preston area.

2) NEEDLESS DESTRUCTION OF GREENBELT , although this land proposed for the development has been labelled (misleadingly) safe guarded, I still perceive this as green belt. It is widely known that house developers prefer to build on green belt land as it provides them with greater profit margin. For the sake of our environment we need to ensure that all empty, derelict and brownfield sites are exhausted before considering green belt. The proposed site is in a rural area and should remain this way - residents purchased their properties because they wanted to live this way and not be part of one large housing estate.There are very few natural green belt areas close to Preston town centre, these areas need to be protected.

3) NEEDLESS DESTRUCTION OF WILDLIFE HABITAT over the past years I regularly see bats, owls and birds flying around my property along with hedgehog's, newts and frogs in my garden. Such a development would destroy these creatures and their habitats.

4) INCREASED FLOOD RISK the fields around this area are already quite sodden, replacing the fields with houses would only make this problem much worse.

5) INCREASED TRAFFIC LEVELS all the roads in surrounding area are extremely congested already, especially Leyland road. This development would make a problem we already have considerably worse.

6) INCREASED NOISE LEVELS AND POLUTION the extra traffic generated during construction and when construction is complete will generate massive noise levels, pollution for all residents,

dust and muddy roads for years to come.

7) NO INFRASTRUCTURE IN PLACE additional requirements for the already stretched health service,
policing and schools is not in place.

I trust you will take these points into consideration and conclude there is no place for a
development of this scale in this proposed area.

Yours sincerely,

[redacted]

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2) NEEDLESS DESTRUCTION OF GREENBELT , although this land proposed for the development has been labelled (misleadingly) safe guarded, I still perceive this as green belt. It is widely known that house developers prefer to build on green belt land as it provides them with greater profit margin. For the sake of our environment we need to ensure that all empty, derelict and brownfield sites are exhausted before considering green belt. The proposed site is in a rural area and should remain this way - residents purchased their properties because they wanted to live this way and not be part of one large housing estate.There are very few natural green belt areas close to Preston town centre, these areas need to be protected.

3) NEEDLESS DESTRUCTION OF WILDLIFE HABITAT over the past years I regularly see bats, owls and birds flying around my property along with hedgehog's, newts and frogs in my garden. Such a development would destroy these creatures and their habitats.

4) INCREASED FLOOD RISK the fields around this area are already quite sodden, replacing the fields with houses would only make this problem much worse.

5) INCREASED TRAFFIC LEVELS all the roads in surrounding area are extremely congested already, especially Leyland road. This development would make a problem we already have considerably worse.

6) INCREASED NOISE LEVELS AND POLUTION the extra traffic generated during construction and when construction is complete will generate massive noise levels, pollution for all residents,

dust and muddy roads for years to come.

7) NO INFRASTRUCTURE IN PLACE additional requirements for the already stretched health service,
policing and schools is not in place.

I trust you will take these points into consideration and conclude there is no place for a
development of this scale in this proposed area.

Yours sincerely,

[redacted]

FEEDBACK ON PROPOSED PICKERINGS FARM DEVELOPMENT.

Dear Sir / Madam,

I am writing to express my OBJECTION to the prorosed Pickerings Farm Development for the following reasons :

1) NO REQUIREMENT FOR ADDITIONAL HOUSING IN SOUTH RIBBLE, taking the proposed Pickerings Farm development and current developments in Leyland under consideration there is no requirement for additional housing in this area. There is already a large number of housing developments underway in the Preston area.

2) NEEDLESS DESTRUCTION OF GREENBELT , although this land proposed for the development has been labelled (misleadingly) safe guarded, I still perceive this as green belt. It is widely known that house developers prefer to build on green belt land as it provides them with greater profit margin. For the sake of our environment we need to ensure that all empty, derelict and brownfield sites are exhausted before considering green belt. The proposed site is in a rural area and should remain this way - residents purchased their properties because they wanted to live this way and not be part of one large housing estate.There are very few natural green belt areas close to Preston town centre, these areas need to be protected.

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dust and muddy roads for years to come.

7) NO INFRASTRUCTURE IN PLACE additional requirements for the already stretched health service,
policing and schools is not in place.

I trust you will take these points into consideration and conclude there is no place for a
development of this scale in this proposed area.

Yours sincerely,

[redacted]

Comments for Planning Application 07/2021/00886/ORM

Application Summary

Application Number: 07/2021/00886/ORM

Address: Pickerings Farm Site Flag Lane Penwortham Lancashire PR1 9TP

Proposal: Outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings

Case Officer: Mrs Janice Crook

Customer Details

Name: Not Available

Address: Not Available

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Design
- Size

Comment:In brief my objections cover the following issues and I reserve the right to send in a more detailed e mail to cover all the following headings. This application forms the main part of a larger development.

Loss of green space separating the communities of Penwortham Lostock Hall & Farington. Overdevelopment in the South Ribble area and an inappropriate development. Loss of flora and fauna. Damage to the environment. Emergency Climate Change v house building and materials used. Missing and misleading information. Pylons - Green area for recreation. New Masterplan. Highways and existing traffic congestion. Amenities and Services including GP's surgeries, dentist, schools etc. already overstretched. Flooding and drainage.

Date 19.11.21

[redacted]

[redacted]

For the attention of Mr Jonathan Noad and Mrs Janice Crook

Additional and more in-depth submission to my objection submitted online via the SRBC Portal for applications **07/2021/00886/ORM - 07/2021/00886/ORM.**

The **loss of green space between communities of Penwortham/Lostock Hall/Farington** which at present gives an area that is used by farmers and this area was a perfect place for people to take their daily exercise, whilst we went through lockdown. It was area that families used to take their families for exercise as was advised by government and to educate younger children about nature and the area is also used for such things as jogging, running, dog walking, cycling and horse-riding. Resident from the area and the surrounding areas didn't need to get into their cars to find an area that is green. If this area was taken away with development, it would also take away the that much needed green space between communities.

My next objection to the development is the fact that there has been **overdevelopment of the South Ribble area and an inappropriate development** with a number of large projects already passed or being worked on. For eg. The Leyland Motors Test Track site and closer to the dev. site the Vernon Carus site. These along with other sites and windfall sites will cover the 5-year plan to meet the governments requirements without including a massive new 'village' if you can call this a village.
The Standard method figure of 206 homes is required by SRBC per annum to meet the government requirements. Excluding the Pickering's (or The Lanes) I understand that SRBC would be able to cover the 5 year requirement.

Loss of flora and fauna. Damage to the environment over the area of the proposed new masterplan as submitted by TW & HE.
The trees and green fields presently hold the carbon etc. and the home of breading wildlife. By replacing this expanse of green area with roads and homes and other buildings with small area's set aside for Public Open space will be releasing CO2 Carbon Dioxide, CH4 Methane and NO2 Nitrous oxide into the atmosphere, these have been stored for centuries soaking up these pollutants.. and by releasing these will be against the work of Cop 26. With both developments there would be a loss of natural habitats for the many wild creatures which are now classed as becoming extinct. I have collected over time photos of Little Owls, Fawns. Butterflies if you require copies of these please let me know. There is also bats and a variety of birds and of course there are hedgehogs, rabbits foxes and bees along with farm animals like cows sheep and also horse. This is just a general short listing of creatures that have made this area their home. The light and noise pollution from any type of development will be detrimental to the wild creatures during development and in the future when residents move in.

We also need open areas to allow us, as humans, to have some clean air, which was proven over the many months of lockdown also before and after the pandemic,
This application does not comply with National policy sets out that planning should provide biodiversity net gains where possible. The application is also against the intent of Policy G16 – Biodiversity and Nature Conservation of the adopted South Ribble Local Plan (2015)
The area was a perfect place for people to take their daily exercise.

Damage to the environment. <u>Emergency Climate Change – house building</u> and developments.

In July 2019 the Council (SR) declared a climate emergency and the effect of climate change within the borough poses an immediate danger to the Health and Wellbeing of their residents. To combat this threat the Council set a goal of rendering the borough carbon neutral by the year 2030.
For this development to be considered, material and building practices to help the environment and climate change should be included for example: - the type of heating. New builds should be built to include new innovative **proven** methods of heating to decrease the carbon emissions that is also affordable to run to decrease the carbon emissions Gas boilers are going to be phased out by 2035. It was announced that the government will be offering subsidies of £5,000 towards a replacement of low carbon heat pumps, in April 2022 but only for 90,000 homes. Surely developers should be now looking to build low carbon homes. If homes continue to be built with gas boilers this is going to mean all these new developments will add to the housing stock which have gas boilers which is presently estimated to be some 25 million homes. However, this does not help SRBC's aim to become carbon neutral by 2030. Homes should also be well insulated to a standard that the new low carbon heating pumps can be successful.
South Ribble BC are planting trees, but these take years, 15-20years to become mature. The trees also need to be the type which hold the pollutants all year round not just during the summer when they have leaves. However, I believe tree planting is not always successful and whips etc sometimes fail.
But thinking of trees consider all the wood that would be included in both developments (and the safeguarded land) just to enclose each garden, which seems to be the methods used by developers for the past 20 or so years and used as sound barriers. There would have to be many thousands of trees felled. How can the world keep up this destruction of trees.
The other problem with these fences is that they rot. Even when assured that it is compression treated and will last 30yrs I can from experience confirm they will need replacing in 10=20yrs due to rot. By then of course the builders have disappeared and their responsibilities will end up with the owners of the property to replace their fencing.
Looking forward I am aware of the drive for electric cars, I understand that electric charge points are to be included. This would be great for people who can drive up to the point that does not need a lead running across a pavement. But what about the properties that this can not be the case. Does this mean someone has to be without a car to purchase their new home. Then there is the families who may have 3-4 cars especially in households who have adult children living with them all trying to manoeuvre to charge their vehicles.

Missing Information and misleading information

How many people were notified by letter by South Ribble? The SRBC Portal has not got this information included although there is a caption to give this information.

There is no information on the Southern area of the masterplan, which is Safeguarded land, although it is mentioned in the new Masterplan.
There is no indication as to how many homes TW & HE will want to build in this area to eventually complete their masterplan. I believe the masterplan is incomplete.

I thought that a development of this size has to have a masterplan in place the new one submitted with the 2 new applications have not been before the planning committee for acceptance as the last one was refused by SRBC planning committee in September 2020.
I was originally contacted by TW & HE November 2018 as I was one of the lucky people to receive a leaflet to advise me of a consultation that was running regarding this development. I say lucky to receive mine as I am well aware that although they stated certain areas were sent these leaflets many did not receive them.
I attended that consultation and became a member for Keep Bee Lane Rural (KBLR). I also received a leaflet from TW & HE a couple of months ago advising of the new plans. However, I do question the fact that in TW & HE documents they insist that they have been working alongside the residents. I dispute this as I do not believe that they have been consulting with residents apart from the above mentioned. The last correspondence was headed The Lanes newsletter August 2021 and it stated we could have our say and they had submitted a revised outline planning application. It was some time after that the documents started to appear on the SRBC Portal. This newsletter also stated that since June 2018 they had carried out extensive community consultation. Also mentioned is that they had consulted with **local residents** whose homes fall within the boundaries of the site. But this as **NOT** been so. I am sure there are residents who have brought this up with yourselves and although they live within the boundaries apart from the consultations in 2018, they have not been consulted about these new applications other than what I have had. There was a short period in 2019 where there was a few meetings held at the civic centre which I attended along with a few other residents and councillors from the area's that would be effected, but these were never followed up on in particular I recall LCC Highways representative saying he would organise a meeting at the offices so we could understand their system of decision making by the department.

There appears to be little or no consideration to the people that bought their properties within boundaries in good faith that they could live in the peace and quiet of a rural area. Certainly not that they would become surrounded with a building site for up to the next 15 years if this development was given the go ahead.
Please do not say, 'but they will have known about a proposed development engulfing the area because it's been in the pipeline for many years.
I can give an example only going back to 2019:-
A lady was about to purchase a property on Chain House Lane, the property she was going to purchase has a public pathway at the side of the property which runs into the development area.

Her solicitor had not picked up that there was a planning and masterplan application in the pipeline, she had not picked up on this because she was moving to the area from Manchester.
She was quite happy to have the odd occasional dog walker walking or the occasional person out for a run or walk down her drive but when she did hear about the development via a Facebook group she joined, for Lostock Hall and started asking questions she then got her solicitor to look into it.
She decided to pull out of the sale even though she lost money and ended up homeless as she was just days before the point of moving in when she found out about the development. She was told by her solicitor that they would not pick up in a general search until such time as the masterplan and planning applications is lodged (at that time they were not). This is in relation to PROW 7-4 FP4 which shows in the travel plan fig. 2.6.
I feel for other people who will have paid a premium to live in what they thought would be their dream home, in the countryside with fresh air to breath to help with their breathing. I understand there is a number of people who live within the boundaries of this development who are in ill health and are diagnosed with breathing/lung issues. Having to breath in dust and particulates from such a development around them is going to be detrimental to their health.

Pylons - Another area of concern is the huge electricity pylons which run across this development.
I do note that on the new masterplan shows that the architect that drew this up was aware of the dangers surrounding living under the pylons and electric cables crossing the fields, as they show it as a green area which they say "are being giving over to Public Open Space (POS)". They also state they are not required to give over POS because of a Park in Penwortham called Hurst Grange Park.
However, I believe this is not really giving anything to residents as I understand there are dangers in relation to building homes underneath pylons.
It was reported in the Independent Newspaper way back in June 1988 that electricity pylons and power lines **DO** pose a cancer risk. The argument about this issue started some 20 years earlier and has continued to be a source of debate. So, in effect TW & HE are happy at people using these area's which are in fact not good for health and wellbeing and certainly not an area that I and many likeminded people would like to use for leisure for themselves and their children. So, although TW & HE make out they are giving something to the community it appears to me they are giving nothing.

New Masterplan and Highways and existing traffic congestion.

There appears to be very little change to the initial masterplan that was rejected apart from splitting the initial planning application 07/2020/00015/ORM from 1,100 homes to two applications one for 180 homes and the other for up to 920 homes plus retail etc which in effect is the same number of homes as the initial application which was withdrawn.

This time however there is no application for a CBLR which I understood was an important part of this development. Which also included reconstruction of the bridge going over the railway at Bee Lane.
There is now access onto Leyland Rd via Flag & Bee Lane this is already an **AQMA** area, using two bridges that go over the railway lines.
1 on Bee Lane and
1 on Flag Lane.
Leyland Road is an extremely busy road and so for anyone wanting access will be putting more pollution in the air whilst idling to gain access. It would be very difficult to turn right from Flag Lane as traffic is usually backed up from Lostock Hall lights to way past the roundabout at Bee Lane and The Cawsey. Residents in the area did think and was hoping that the new road through the Cawsey as a part of the CBLR would relieve the traffic along Leyland Road. Last Thursday I witnessed the traffic congestion, even before the peak time in fact it was only 2.45pm. At that time there was no apparent reason for such a build up other than the volume of traffic.
The Main access - Entrance Gateway is proposed to be via the A582. To have the traffic from this development both homes and businesses and a school will create further traffic congestion on the main A582 both for people traveling to the motorway access point and into Leyland and in the opposite direction going into Preston.
Not all new or forthcoming developments have been included in TA's and I would bring your attention to Highways England /National Highways and LCC Highways responses.
The A582 is already a nightmare especially at peak times and if there was more additional traffic movement during construction and after with the amount of additional traffic movement from further development as is proposed it really will be a total nightmare for people to travel. In addition, there will be additional traffic movement from several ongoing developments plus the employment area on the Lancashire Business Park off the A582 which has recently been given the go ahead for further expansion. I am also aware of the expansion of the Wymott and Garth Prison and although SRBC are not the council making decisions on this SR have been asked for their comments as it will considerably increase additional movement in the roads around Ulnes Walton and the A582. With more inmates, there will be considerably more staff plus visitors to the prison and additional deliveries made. This is going to mean more traffic to hit the A582.
Without having to use computer programs etc it is obvious to a layman that there will be a total gridlocked as the A582 from the tank roundabout to the motorway system is already frequently at gridlock especially at peak times. Obviously whilst lock down was in place there was an easing of traffic but of course now it is as bad as ever.
Even if one day the A582 was dualled it would only make more bottlenecks on the approaches to the motorway system and problems on roads leading to the A582.
It is pointless basing traffic movement on the 2011 Census, over the past 10 years there has been an explosion of new homes built in the Leyland, Lostock Hall, Penwortham, Walton Le Dale, also in area's just outside of South Ribble for example on Wigan Road which would also use the motorway system served by the A582.
There is also the land that was earmarked for Ikea which I presume one day will bring in more traffic from business and homes.

Amenities and Services including GP's surgery's, dentist, schools etc already overstretched

From experience I have noticed that the local GP Surgeries are all struggling. This started to happen before the pandemic. I know at my surgery I could if needed make an appointment within a day or two. Now just to speak to a doctor can take up to 3 weeks. I know also it's a struggle to get through on the telephone. There as been many a time I have been hanging on for over an hour to speak to the receptionist. Now the system can tell you where you are in the que. Only last week I was 17th in the que, and it took 1hour 34 minutes and I was still 2nd in the Que. This is just an example as I know to well this is not just myself that's experiencing these delays. Plus, it isn't just my GP practice. I understand there are staff shortages in all areas within the NHS and they are doing their best both at the local surgeries and the main hospitals but when people move into the area wanting advise as to which doctors to register it's impossible to give such advice. There is so many new patients at the local surgery's and they can not cope. This development would be putting on more even more pressure putting more patients at risk. More pressure on the staff and all the supporting elements connected with medical health and wellbeing.

School's

figures are questionable.

No new High School?

And would a primary school actually be built?

If built, then the school would not be limited to just residents children and so would mean more road traffic.

What happens when the children need to move to High School or an Academy? There appears to be no consideration for the next stages of education. As figures are not inclusive it's hard to assess the needs in the future.

Other Services

To cover the additional households more Police and Fire people would have to be employed in the area. OK you may say that some could be employed through the new residents of the development but surely this is just going round in circles. If you didn't have such a development the area wouldn't need additional cover.

Transport.

Bus services. How many new developments have promises of the services but it either doesn't happen or it's set up for a length of time and as soon as the time put forward at planning stage comes to an end the service stops or is limited.

I am aware South Ribble want to encourage use of public transport. Or cycle or walk but to be realistic in the Northwest climate we have little dry and pleasant weather for cycling and walking to work. And where are they going to walk to? It is more realistic that they will jump in their car to their employment. This way they do not have to get wet or cold.

It suggests that apart from the affordable homes most people will have to take out large mortgages and to meet their commitments will be commuting to their employment to chase the well-paid jobs in surrounding cities including Manchester, Liverpool and for some further afield.

Affordable Housing,

I did note that at one of the planning meetings for 2016/0591/OUT the developers were requesting to change the 106 due to failure of the Starter Home Initiative and recent changes to lender requirements obtaining mortgages for DOMV units. The developers were advised that this tenure has become less financially attractive to sell under the current Section 106 agreement. So, in effect the same would possibly happen with these developments.

Flooding-

I have many photos of flooded areas within the Pickering's Farm development area. Extreme weather conditions are becoming more frequent, and I believe that although there are plans set aside for containing surface water, I doubt it will be sufficient with an access to Mill Brook. This is a brook and not a large water way which runs the opposite side of the A582 and leads into the River Ribble. Going in the opposite direction the brook meanders across the land and under Chain House Lane and down the side of Brook Lane. At times of excessive rainfall, the land already floods.

During periods of heavy rain, we see so often, new estates flooded. I suspect that when they submitted their plans that they used computer programs and artificial rain to assess rainfall and it's effects, they must of thought there would never be any issues. For an example a relatively new development in neighbouring Chorley area called Buckshaw Village as it's problems with flooded roads. Maybe not as severe as in other area's but it does give a good example.

I would doubt these plans can guarantee that the new development will not have issues for example like they have on Buckshaw Village.

When the lay of the land is altered surface water must go somewhere, it may not show itself within the development but further afield.

There is often reports of the A582 being flooded in area's when we have heavy downfall and that is without this development going ahead.

I note that LLAF one of the consultee's are not satisfied with what has been submitted. Public services. They state in their last paragraph *'We ask to be re-consulted following the submission of additional information addressing surface water drainage proposals. We will provide you with comments within 21 days of receiving formal re-consultation'*

I do hope that my concerns are taken into consideration and the decision from the planning committee will be that of refusal.

[redacted]

Pylons - green space & exercise track?

Destruction to wildlife flora/fauna & land that holds the harmful carbon dioxide.

Flooding.

LCC Public Health - Given the strategies specifically mention "healthy food" as a priority and the high levels of obesity within the ward, when considering the types of businesses to be granted planning permissions within the Local Centre we request limits be put on applications from Sui Generis Hot Food Takeaways venues; with no new venues being allowed on the development. We request that this is incorporated as a condition into the decision notice

We therefore request the provision of a water fountain and a water bottle refill station within the Local Centre and at the two LEAPs in the site. We request that this is incorporated as a condition into the decision notice.

Wood used in the miles of fencing which will be used.

Development in Farington 07/2021/00966/REM | Application for Reserved Matters of Scale, Layout Appearance and Landscaping following outline approval 07/2019/00781/OUT for a 51,793.40 sq m building (Use Class B8) with ancillary office space and associated works | Land West Of Lancashire Business Park Centurion Way Farington Preston PR26 6TS Access Road 1362 18 hour AAWT (Annual Average Weekly Traffic) Arriving 266 over 24 hours Departing 280 Total of 24 hours HGV movements 546,

KBLR response to the Masterplan Flood Risk and Drainage Strategy and Appendix 11.1 Lee Roxborough and McCloy Flood Risk Assessment

Executive Summary

- The Flooding assessment Appendix 11.1 fails to state what the uncontrolled surface water runoff will be for the development. This information is essential to set a design baseline.(para 1.2)
- By making reasonable assessment of impervious surfaces it is estimated that the post development run off from catchment A will be 4034 m3/hr and from catchment B 4076 m3/hr. (para 1.3, 1.4)
- In order to control this excessive run off rate the developer proposes a large flow controlled gravity draining attenuation basin to the west of the site for catchment A, and a large flood basin with flow controlled pumped outflow to the North of the site for catchment B.(para 2.1, 2.2, 2.3, 2.4, 2.5)
- For catchment A the developer proposes that the new dwellings will have raised foundations with a minimum height of 0.15 m, however, tellingly the developer remains silent on the maximum height of foundations. Because of the need to dispose of 40,000 cubic metres of excavation spoil from the attenuation basin and associated swales it is almost certain that large areas of the site will be raised to the detriment of existing dwellings. (para 2.3).
- For existing dwellings at ground level this proposal will considerably increase flood risk relative to those with raised foundations.(para 2.3)
- The developer states that property in catchment A will be protected up to a 1 in 30 year rainfall event. For structures designed for a 60 year life those structures will on average experience two flooding events in that time. Data produced by the Met office states that the probability of 1 in 30 flooding event has increased for all regions of the UK during winter and for Dorset and the North West of England in particular for summer periods, so it is highly likely that these properties will experience more than two flooding events on average in 60 years. (para 2.3)
- The catchment B flood basin is designed with significantly raised earthworks on the southern side of the basin. Again the developer states a minimum height of 0.63 m above the 1 in 100 year flood level. Note again no maximum is quoted and that the height is not relative to a ground level datum but to a flood level. It is quite possible that the earthwork berm could be 1-2 m in height. Note that this raised earthwork structure completely or partially surrounds a number of existing properties. Those properties will be at significantly increased risk of flooding and the environmental and visual impact will be severe. (para 2.6, 2.7,2.8)
- A graphic is provided in Appendix 11.1 that shows in a 1 in 100 flooding event plus a 40% global warming allowance the flood basin has insufficient capacity and it preferentially floods Kingsfold which is unprotected because of the absence of protective earthworks on the north side of the flood basin. Indeed it appears that the raised earthworks to the South of the flood basin are designed to protect the site to the South whilst sacrificing Kingsfold to the North. (para 2.8, 2.15)

- The flood basin has a capacity of 16,205 cubic metres. At a run off rate of 4076 cubic metres per hour the basin will flood in just under four hours. It is suspected that this is the reason no post development run off rates are provided in any of the documents as this capacity appears inadequate. The pumps are limited to a rate of 100 litres/sec so they will have little impact on this flooding time. It is reported in a Defra/Environment Agency paper "Extreme Rainfall and Flood Event Recognition" Aug 2002 that for the majority of extreme rainfall events measured from 1930 to 2000, the duration ranged from 3-60 hours with the average ~20 hours. This data indicates that the flood basin design will be ineffective for the majority of extreme rainfall events as it has insufficient capacity. (para 2.13, 2.14)
- The use of a pumped outflow from the flood basin provides another system vulnerability and is likely to be in continuous use to maintain a drained basin in the event that an extreme rainfall event should occur. If these pumps are electrically driven the electrical supply also needs flood protection, and no mention of this is made in the report. Indeed the Welsh Government states that for groundwater drainage solutions "*because of the ongoing energy and maintenance requirements of pumping water and the risks associated with failure pumping should be avoided where possible*" (para 2.9,2.10).Certainly the use of a pumped discharge system is not sustainable.
- There is no assessment, in any of the Flooding documentation, of the impact of system failure either through poor design or maintenance. Indeed it unclear who will be responsible for the costs of system failure should this occur. The lack of clear accountability for system failure resonates with the situation apparent for the Grenfell Tower tragedy, with multiple design authorities involved but no clear accountability. (para 2.11 and section 4)
- There appears to be significant shortcomings regarding the hydrological model employed in the flood predictions. In the section of the appendix dealing with model validation the authors claim that the pictures of extreme flooding posted on the internet by scheme objectors represent a historic 1 in 30 year rainfall event and the model accurately predicts the extent of flooding observed in the photographs. Any local resident will point out that the flooding observed in the photographs occurs regularly and is not a 1 in 30 year event. This then raises serious questions regarding the integrity of the model and its ability to predict current regular flooding and a true 1 in 30 year event. (para 3.1, 3.2)
- The authors also state "No detailed flood data is available for accurate validation or calibration of the model" yet this proposal has been promoted by developers since 2015. It is therefore remarkable that in the intervening period no attempt has been made to collect this critical data. (para 3.2)
- Spoil disposal from the excavation of the attenuation basin and swale system to the west of the site will generate approximately 40,000 tonnes of waste boulder clay, requiring the equivalent of approximately 2,000 truck trips. This has the potential to generate a significant emission and transport problem. It is unclear how the developers propose to manage this spoil generation. (section 5)

- The utility company responsible for sewage treatment in the region is United Utilities. This company has a shocking record of underinvestment and routine discharge of untreated sewage to river and sea, indeed it has the worst record in England. This is symptomatic of a local sewage treatment infrastructure that is not fit for purpose. On this basis alone no new housing development applications should be approved in South Ribble until United Utilities can guarantee that routine discharges of untreated sewage to river and sea have been halted. Approving this application is almost certain to increase the frequency and duration of such discharges. This is totally unacceptable as it is maximising shareholder profit at the expense of our environment. (Section 6).

1 Setting the baseline

1.1 Existing run off rates for the two main site catchment areas for the site, catchment A and catchment B are estimated by employing data from Figure 4.1 and Figure 4.4 and table 4.2, 4.3 and 4.4. Figures 4.1 and 4.4 are overlaid to provide a surface area weighted existing run off rate. Data for the 1 in 100 year rainfall event plus 40% global warming contingency is used.

1.2 Catchment B, 23.1 Ha total area, is covered entirely by existing catchment 3 and therefore has a total existing runoff rate of 23.1/54.5 x1335 litres/sec = 566 litres/sec = 2038 m3/hr.

1.3 Catchment A , 54 Ha total area, area consists of approximately 50% existing in catchment 3, 30% in catchment 2 and 10% in catchment 1 giving a weighted run off rate of ((0.5 x1335)+(0.3 x376.5)+(0.1 x 184.3)) x 54/77.4 = 560 litres/sec = 2017 m3/hr

1.4 Appendix 11.1 states "Uncontrolled flows from the development will exceed existing run off rates" but the report fails to state what they would be.

1.5 Data from a drainage strategy paper for a site off Blackburn Road Longridge indicates that for a site of this nature with a total development area of 30,000 m2 , buildings occupy 10,090 m2 and roads footpaths and parking occupy 12,310 m2. Therefore the percentage impervious surface is 22,400/30,000 = 75%. Leaving a permeable surface for run off attenuation equivalent to 25% of the development area.

1.6 Taking a position assuming 50% permeable land remains for both catchments post development, the development run off flow is likely to be at least double the existing run off flow, which for catchment A is 2017/0.5 m3/hr or 4034 m3 per hour and catchment B is 2038/0.5 m3/hr or 4076 tonnes per hour. This is fundamental baseline information which was excluded from Appendix 11.1.

1.7 The site is essentially landlocked with only one watercourse available for drainage namely Mill Brook.

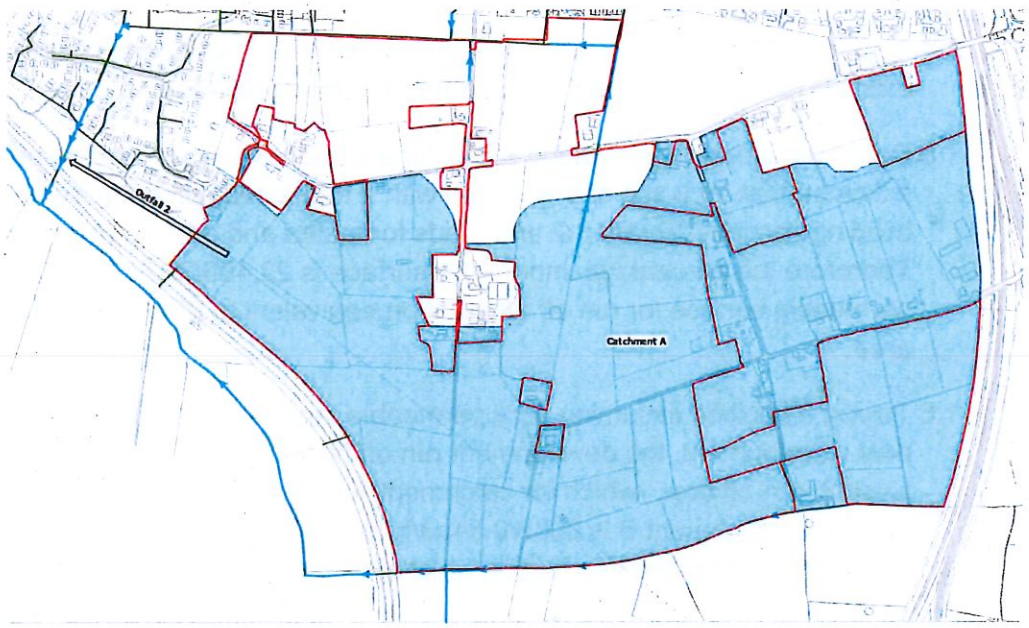
1.8 Mill Brook also serves to drain surface water from existing developments in Kingsfold and Penwortham and from the surface of the A582 and the Penwortham Bypass and from existing properties on site. There has been no attempt to calculate the run off flows from these existing sources for the I in 100 year design scenario above, and whether Mill Brook is capable of functioning under such circumstances and what the water levels are likely to be.

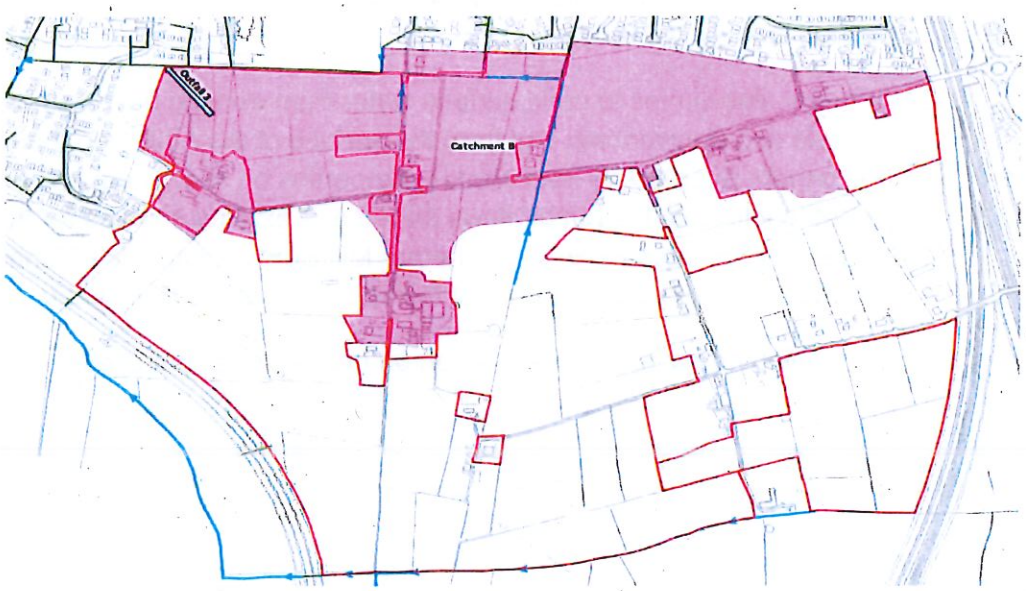
1.9 The developers recognise that site run off needs to be controlled.

2 *The proposed solution.*

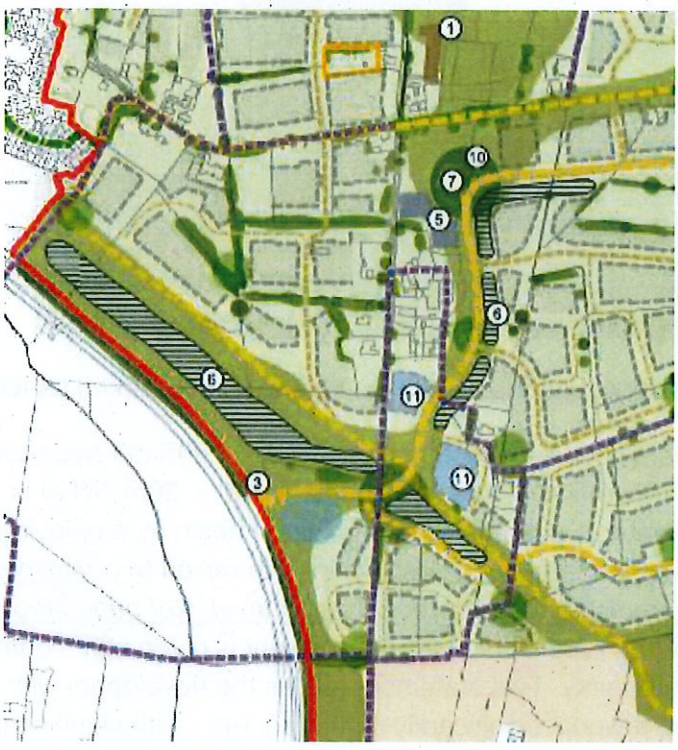
2.1 The developers propose the use of two outflows from site both draining to Mill Brook. One is to the North of Kingsfold using the Northern Tributary Boundary Culvert (Outfall 3). The second is to the South of Kingsfold where a drainage culvert crosses Penwortham Way (Outfall 2).

2.2 These outfalls will serve two drainage catchment areas A and B. Catchment B is the area of site that has the seriously challenging flooding risk and drainage conditions and will be drained to Mill Brook via Outfall 3 (Northern Culvert). Catchment A is 54 Ha and existing drainage is 560 litres/sec for the 100 year plus 40% event. It is proposed to drain this via Outfall 2. Catchment B is 23.1 Ha and has a drainage rate estimated at 566 litres/sec for the 100 year plus 40% event. Because of the site topography and geology both catchments face considerable flooding risk. The diagrams below show catchment details.





2.3 The proposed flood mitigation solution for catchment A is a large attenuation basin with an interconnected swale system. The development floor levels will be set to a *minimum* of 0.15 m above the ground level. The lack of any information on the likely maximum foundation elevation indicates extreme design uncertainty. In some areas it is likely that foundations could be raised to 0.5 m. Houses and hard surfaces will have piped surface drainage systems that will prevent flooding up to a 1 in 30 year event. That equates to a yearly probability of such an event occurring as 3.33 %. As these houses will be built to exist for a minimum of 60 years each property in this catchment is likely to experience on average two flooding events over sixty years. *The probability of flooding for existing properties in this catchment without raised foundations is likely to be far higher.* It is also noted that these "thirty year" events are becoming far more frequent as indicated in the met office report to Ofwat dated July 2010.It states all winter rainfall events for all areas of the UK are predicted to become more frequent, and that for the 20, 30 ,50 and 100 year events the biggest summer increases are projected to occur over both Dorset and North-West England

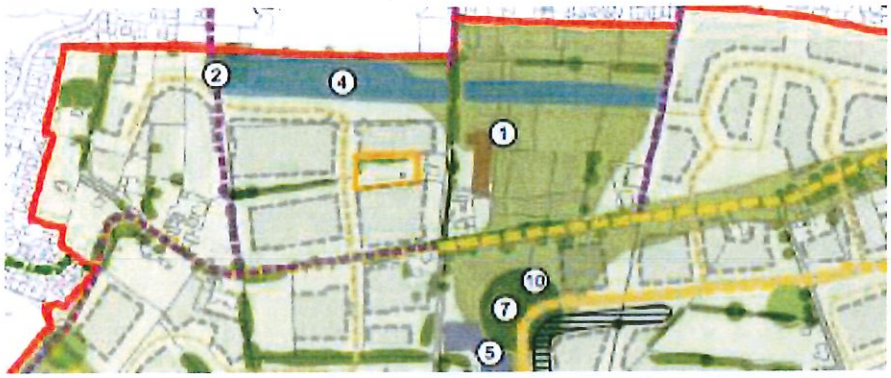


Catchment A attenuation ponds and swale system shown as feature 6.

2.4 The outflow from the catchment A attenuation basin is controlled to 100 litres/sec using a hydrobrake. These structures are vulnerable to silting and require regular maintenance. The reason for the outflow restriction is to prevent excessive demand on the outfall to Mill Brook. It is estimated that the attenuation basin has a surface area of approximately 600 x 25 m. Assuming it will be 2 m deep approximately 30,000 cubic metres of clay spoil will need to be disposed of either

on or off site. Assuming the catchment A attenuation basin capacity is 30,000 cubic metres will take approximately 7.5 hours to fill. This appears insufficient given the likely duration of the 1 in 100 year rainfall event, please refer to para 2.13 below. The total spoil resulting from the excavation of the attenuation basin and the swales is over 40,000 cubic metres. If disposed of on site the implication is that significant areas of the site will be raised with an increased flood risk for the existing dwellings in the vicinity. Vague references are made in the documentation to the need to raise parts of the site but no specific values are given.

2.5 The proposed flood mitigation for catchment B is far more complex because of the site topography and drainage catchment area. It is concluded in the appendix 11.1 that there is insufficient gradient for gravitational flow from an attenuation basin as for catchment A. The approach proposed is to create an artificial flood basin at the north boundary of the site shown as feature 4 on the Illustrative Master Plan. The scheme is also shown in figure 4.12 of Appendix 11.1 and on McCloy drawing titled "Proposed Daylighting and Reprofiling" Fig No M01852-01.

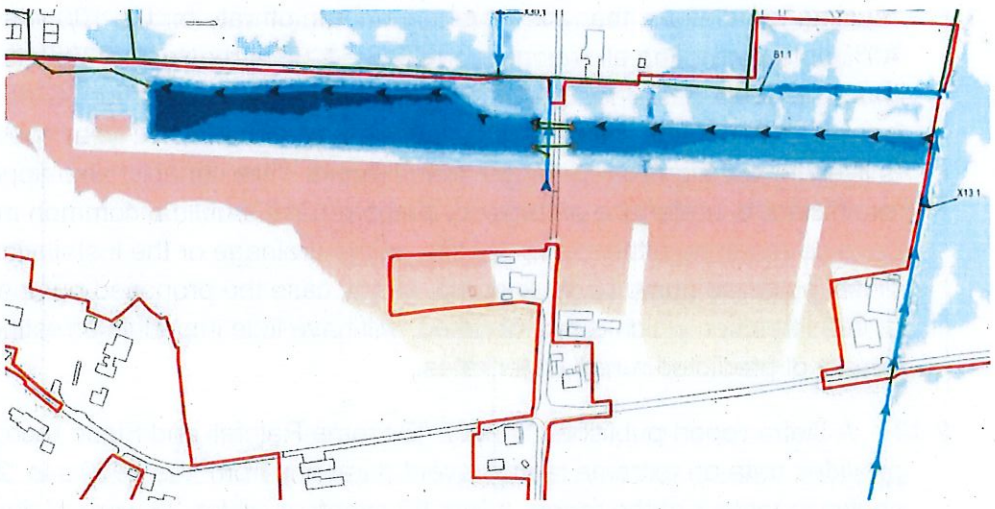


The flood basin as shown on the Illustrative Master Plan (marked as feature 4)

2.6 The drawing shows a flood basin with a capacity of 16,205 m3 Appendix 11.1 table 4.5. The estimated area of the flood basin is 400 x 20m .What is concerning is that water is channelled into the flood basin by employing raised earthworks to the south of the flood basin which are raised to a *minimum level of 0.63 m above the predicted 100 year event water level. Ref page 40 of appendix 11.1.* It is noted that no earthworks maximum height is given again demonstrating extreme design uncertainty. This statement leaves the developers with the freedom to raise earthworks significantly higher eg 1m+, with significant environmental detriment to the existing properties. This does not appear a credible solution given the impact the earthworks will have on existing property owners..

2.7 This artificial earth "berm" is not shown on the masterplan illustration. However a number of existing properties at the North end of the site are shown in the referenced McCloy drawing at the back of Appendix 11.1 partially or completely surrounded by raised earthworks. This is a wholly unacceptable proposal. The authors of the report only state a minimum elevation. The actual height of these earthworks could be far higher (1 m+). This will place these properties at significantly elevated risk of flooding and will adversely impact visual amenity.

2.8 The proposed arrangement is shown below extracted from the McCloy drawing.



Catchment B Flood Basin. The area shown in red is the raised earthworks. Note the existing properties that are totally or partially surrounded by the raised earthworks.

2.9 The design of the flood basin is such that it cannot gravity drain to Mill Brook via the Northern Culvert. What is proposed is a flow controlled pumping station. There is very little design information on the pumping station other than it will incorporate a duty and standby pump. If electrically powered it is critical that the sub-station providing the power is also flood protected. This requirement is not mentioned in the Masterplan documents.The Welsh Government Standard for the design construction and operation of surface water drainage systems 2018 states wrt pumped systems "*Because of the ongoing energy and maintenance requirements of pumping water and the risks associated with failure, pumping should be avoided where possible*"

2.10 The standard also states "*Where the drainage system is to be adopted the developer should ensure that the adopting organisation has agreed in principle to adopt the pumping station before putting in the planning application*" The appendix 11.1 section 5.5.1 simply states "It is *proposed* that the main piped system and pumping station will be adopted by United Utilities". It is not clear if any agreement is in place with United Utilities. Clarification on this matter is the subject of an EIR with united Utilities.

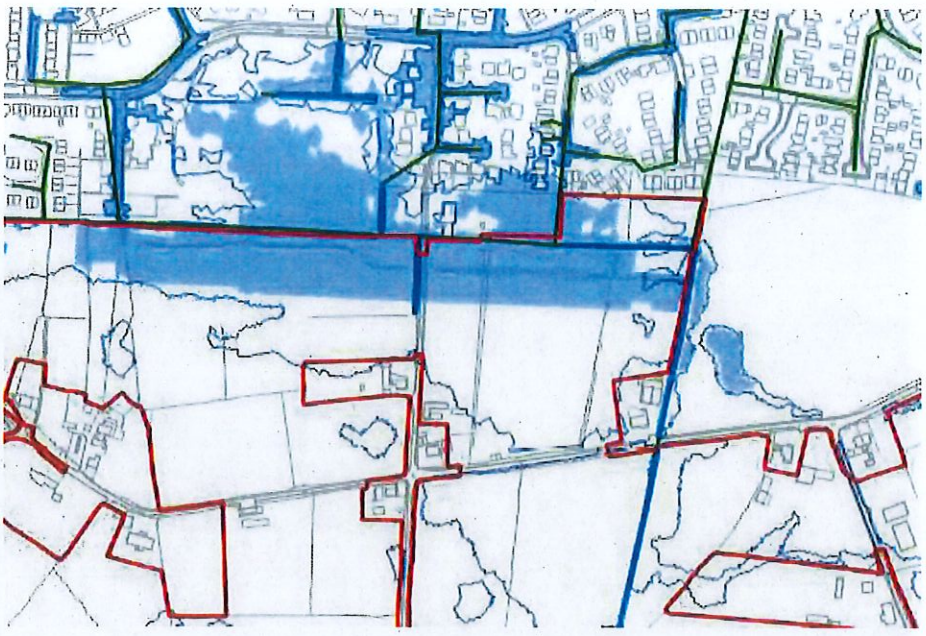
2.11 There is little evidence in the report of a proper analysis of the economic impact of pump system failure either through poor design or maintenance, and it is unclear who will be financially responsible. The impact of system failure will be profound effecting existing and development properties. The authors simply state there is a very low probability of both duty and standby pumps failing and in any case the capacity of the flood basin is sufficient to absorb all flood water runoff. The paragraph below demonstrates that this is not true.

2.12 Assuming the current water runoff rate is 566 litres/sec for catchment B and the area when fully developed will consist of 50% impermeable structures such as houses, roads, parking, and gardens hydraulically isolated by road and housing foundations then the development run off rate for the 100 year event plus 40% global warming allowance is 566/0.5 = 1132 litres/sec = 4075 m3/hr. On this basis the flood basin has sufficient capacity to absorb runoff for 16205/4075 = 4 hours ~240 minutes. This is hardly sufficient as a one in 100 year flooding event is likely to last significantly longer than 4 hours. This capacity also appears insufficient to undertake emergency pump repairs should a common mode fault develop requiring either pump repairs, sump drainage or the installation of a diesel powered pump back up pump. In any case the proposed pumped outflow of 100 litres/sec which is hydrobraked, will have little impact in arresting the impact of predicted runoff water rates.

2.13 A Defra report published in 2002 "Extreme Rainfall and Flood recognition" provides data on extreme rainfall event durations from the 1930's to 2000 shown in table 3 of the report. It lists 60 events of which 32 were of duration between 3 and 60 hours with the average being 20 hours. Should durations of this nature occur for the 1 in 100 storm the majority of catchment B would be flooded after a few hours as the flood basin will have insufficient capacity, and as the outfall pumps are constrained by a hydrobrake to 100 litres per second, which appears insufficient to make any impact on draining a flood basin capacity of 16,205,000 litres.

2.14 Appendix 11.1 section 3.8.1 outlines a "Critical Duration Analysis" which is an attempt to establish the duration of a flooding event (one in thirty and one in one hundred events plus 40% global warming allowance) over which flooding levels are at a maximum. The analysis results in table 3.2 show this to be 360 min (six hours). The authors do not state the duration of the rainfall event which was employed as the basis of this analysis. This result does not appear credible as it appears likely that most extreme rainfall events will occur over a much longer duration than 6 hours. Also after four hours the flood basin protection will have failed rendering this analysis meaningless.

2.15 It is clear in the appendix 11.1 that the flood basin is designed to protect the site. What may not be apparent to the reader of the Masterplan documents is that the impact of the flood basin design is to considerably increase the risk of flooding to properties in Kingsfold to the north of the flood basin. The diagram below, next page, shows the impact of the proposed flood basin design on Kingsfold. It is unlikely that the residents of Kingsfold or the appropriate authorities are aware of this significantly enhanced flooding risk.



Note this figure given as Fig 4.15 in the Appendix 11.1 shows the flood basin filled and overflowing into Kingsfold in the case of a 1 in 100 year event plus a 40% global warming allowance. Note the raised earthworks to the immediate south of the flood basin "protect" the site at the expense of Kingsfold which has no protective earthworks. Note the diagram does not show the full extent of flooding in Kingsfold; and that the Penwortham Town Council Building appears to be impacted by flooding.

2.16 Not only has the flood basin been designed to flood Kingsfold in preference to the site it is also proposed to re-direct surface water that originates in Kingsfold and is currently managed via the Northern Culvert, to a more southerly culvert . Para 6.5 of the Lees Roxborough report Appendix 11.1 states "it is proposed to redirect flows (from Kingsfold) currently entering the system from upstream outfall B (Northern Culvert) to downstream (outfall A) of the existing development (More southerly Culvert under Penwortham way) and hence reducing the volume of water reaching the most vulnerable area of site". In other words the proposal is to shift the current drainage route from Kingsfold to a more vulnerable upstream position on Mill Brook in order to reduce the volume of flow to the Northern Culvert and hence help protect the site, at the expense of Kingsfold. There is also no mention of how this re-routing is to be achieved and whether the developers have the agreement of all landowners or the Utility company responsible.

3 The integrity of the hydrological model.

3.1 Appendix 11.1 section 3.10 deals with model validation. In this section the authors argue that pictures of "historic" flooding provided by "objectors" to the scheme in fact help validate the model. The authors imply that the two photos in question are from a one off historic event. By comparing the photos with what is predicted in the model they claim the model then accurately predicts such a "historic" event and proves the model is sound.

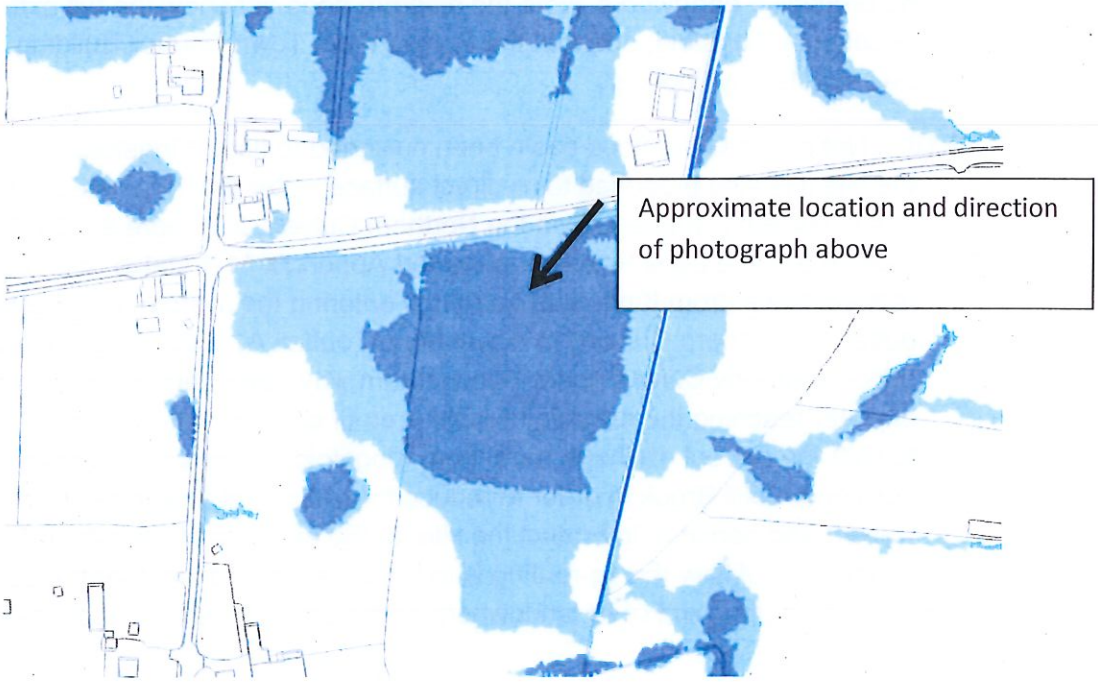


Figure 3-18: Predicted on-Site Flooding (3.3% & 1% AEP)

Light blue is the 1 in 100 year event (1% AEP) and the dark blue is the 1 in 30 year event (3.3% AEP)

They also use the second photo below to "validate" the model.

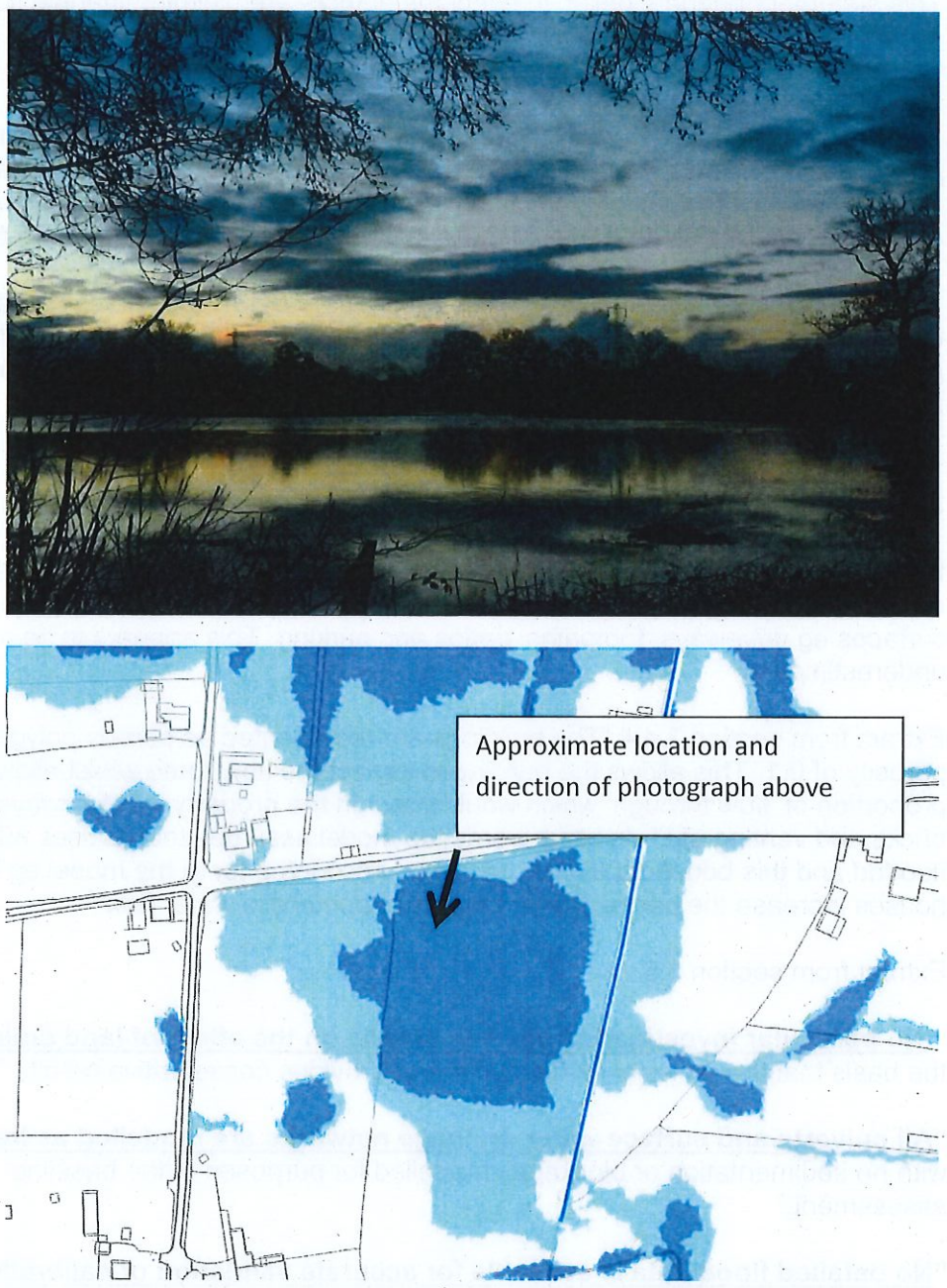


Figure 3-20: Predicted on-Site Flooding (3.3% 1% AEP).

The authors state;

"Model predictions have been reviewed at the two locations to form a degree of model validation; however no dates were provided for the photographs and therefore no historical rainfall data could be obtained to determine the performance of the model under the same rainfall conditions. **The model predicts a significant area of flooding at the locations of the photographs for the 30 year event that corresponds with the general outlines of flooding in the photographs** and in the

absence of more detailed historical data upon which to carry out verification, the model is considered to be sufficiently accurate."

This statement beggars belief, in effect the authors are claiming that the flooding shown in the two photographs is as a result of a 1 in 30 year rainfall event, and thus the model correlates with observed flooding.

It is abundantly clear to the local residents that the flooding shown in the photographs occurs routinely and regularly with major flood events such as those shown in the photographs occurring at least once every five years, so it is false to claim this as a one in thirty year event as McCloy imply in their text.

This cynical misrepresentation of photographic evidence raises fundamental questions regarding the model accuracy and indeed the integrity of the whole report, as it appears to significantly underestimate the true extent of regular flooding that occurs in the development catchments.

3.2 Some additional observations regarding the assumptions underpinning the model

It appears that an assumption of 14% of the surface area of existing developments north of the site eg Kingsfold has been made to account for other impermenable surfaces eg driveways, footpaths, patios and parking. This appears to be a serious underestimation.

Extract from section 3.4.4 "The buildings are represented as porous polygons with a porosity of 0.1. This allows the building to impact the flow route whilst allowing a proportion of 'flow through' which would occur in the property via doorways and air bricks and venting etc.". In other words the model assumes that houses will be flooded and this beneficial impact has been accounted for in the model eg flooded houses increase the permeability of the development to water flow.

Extract from section 3.6

"**No particular investigation has been made on the effect of land drainage**, on the basis that the omission of field drainage provides conservative results."

"**All culverts and surface water drainage networks are modelled as free flowing** with no sedimentation or blockages modelled for purposes of the baseline assessment."

"**No detailed flood data is available for accurate validation or calibration of the model** (i.e. performance of the model prediction relative to a known rainfall magnitude and observed flood extent). The model is verified insofar as it ensures flooding is predicted in any areas where previous flooding has been recorded as discussed further in Section 3.10."

Regarding the last statement it is strange that this development has been proposed for many years yet in all that time there has been no effort to obtain metrological and flood data from the site.

Extract from section 3.7.3 ;

"In order to investigate the potential effect of the model downstream boundary, the downstream boundary level has been increased by 1.0 m. There was no measurable change to flood levels at the downstream site boundary."

The data from climate central ref picture below shows that the annual flood level predicted for 2050 will have a significant impact on the Ribble and potential water levels in Mill Brook shown crossing the A59 South of John Horrocks Way. It is not clear if projected coastal flooding has been accounted for in the analysis described in Appendix 11.1.

Extract from Appendix 11.1 section 3.7.6

"The use of dry clay soil parameters may underestimate flood levels for some flood events with more saturated antecedent conditions, however it is not possible to account for all antecedent conditions. It is considered suitable to assume dry antecedent conditions for design simulations."

Bizarrely the authors have employed a dry clay soil as the basis for their model which appears to contradict the statement given in section 3.4.7 "Ground conditions across the site were noted to be very wet and were typical of a poorly drained soil."

4. Responsibilities for Design and Maintenance of the Flood Management System.

The financial consequences of system failure through poor design or poor maintenance are significant. In none of the documents covering flooding and flood prevention is there any attempt to quantify the impact of system failure.

At this stage there appears to be a complex chain of third party contributors including McCloy consulting, Lees Roxborough, LCC as Lead Local Flood Authority and Taylor Wimpey as developer. Each third party appears to incorporate a number of disclaimers into their reports. Responsibility for system failure appears deliberately opaque.

It is unclear who is financially accountable for errors and omissions should the design principles be proven to be flawed, as they appear to be.

The systems proposed require regular and thorough maintenance and it is not clear who will be directly accountable for maintenance errors and omissions and who will be responsible for the substantial costs.

5. Spoil Disposal.

It is assumed that the flood basin spoil some 20,000 tonnes will be employed to construct the raised bank to the South.

It is unclear how the spoil generated from the excavation of the attenuation basins and swale system to the west of the site will be managed. It is estimated that approximately 50,000 tonnes of impermeable boulder clay will need to be disposed of by transporting offsite or to other parts of the site.

If it is transported for use on site this implies that parts of the site will be raised significantly, increasing the flood risk for existing dwellings

This spoil volume is equivalent to 2,000 truck trips that will occur during construction. It is unclear how this problem will be managed, however the potential environmental impact will be significant

6. Sewage treatment and dispersal.

Although this review focusses on the management of surface water run-off from site it is worth also reflecting on another key element of development infrastructure seldom given sufficient consideration when planning applications of this nature are submitted. This relates to the adequate provision of sewage treatment for the development.

We estimate that the population increase associated with the committed developments in South Ribble will be in the region of 6,400 people. The majority of this population increase is likely to come from outside the South Ribble region.

For this planning application development the population of the site assuming 1100 dwellings is likely to be in the region of 3,600 people, again with the majority coming from outside the South Ribble region.

This is significant relative to the population of South Ribble measured as 110,527 in 2018.

The provider of the sewage treatment in the region is United Utilities. No doubt they will claim that there is adequate capacity to treat the arising sewage from the committed developments and this application in particular.

However it is worth reflecting on the fact that United Utilities is the Company that discharges the most sewage to rivers and the sea in England, having amassed a total of 726,450 hours of routine discharges of raw sewage in a total of 113,940 events during 2020.

The sewage treatment infrastructure in NW England is in a shocking state and is wholly inadequate for the intended purpose.

The committed developments in South Ribble and the current planning applications for the Lanes will significantly increase the volume and frequency of such environmentally damaging discharges as the current sewage treatment systems have insufficient capacity as evidenced by Unitied Utilities appalling record in 2020.

On the lack of adequate sewage treatment facilities alone, no new planning applications should be agreed until United Utilities can guarantee sufficient sewage treatment capacity in the region, as demonstrated by the absence of routine discharges to river and sea.