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### **Sent Via Email**

Dear Janice,

### **Planning Consultations 07/2021/00886/ORM (development of up to 920 dwellings) and 07/2021/00887/ORM (development of up to 180 dwellings)**

#### **Land at Pickerings Farm, Penwortham**

We write in connection with the above planning proposals that are currently subject to an appeal (reference APP/F2360/W/22/3295498) against a determination of refusal of planning consent by South Ribble Borough Council (SRBC).

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways' approach to engaging with the planning system is governed by the advice and guidance set out in:

- The Strategic Road Network Planning for the Future - A Guide to Working with Highways England on Planning Matters (2015).

As a statutory consultee in the planning system, National Highways has a regulatory duty to cooperate. Consequently, National Highways are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

This letter clarifies the position of Nation Highways on both proposals in advance of the appeal hearing.

## **Background**

National Highways were consulted by South Ribble District Council on two residential planning applications submitted by Taylor Wimpey and Homes England for the site known as Pickering's Farm, Penwortham, Preston amounting to 1,100 dwellings, which is allocated for residential development in the current South Ribble Local Plan. Although two separate applications, the two developments have been assessed within the same Transport Assessment prepared by the developers transport consultants, Vectos.

We note that the two planning applications for the site were refused at Planning Committee by SRBC in November 2021. Subsequently, the promoters of the scheme have decided to appeal the decision (Appeal Reference: APP/F2360/W/22/3295502) with the Planning Inquiry opening date set for August 2022.

National Highways provided comments on the Transport Assessment (TA) and Travel Plan prior to the planning committee meeting but had not reached an agreement on the suitability of the evidence provided.

Since that time Vectos have sought to engage with National Highways, but we have found the strength of their cooperation lacking, with confirmation of their client's intention to appeal not provided to us until March 2022. The outcome of the discussions to date is that National Highways has been unable to form a view on the proposals based upon evidence that is acceptable to us.

Against this background, and so that National Highways is able to reach an evidenced view on the, we have therefore had to undertake our own analysis in conjunction with colleagues at Lancashire County Council Highways (LCC). The company wishes to put on record its disappointment at the need to resort to investing its own resources in completing work that should have been undertaken adequately by the applicants. As a statutory consultee, we feel that in this case this is necessary and has been done in the interests of informing SRBC.

As part of the appeal process, LCC have undertaken a revised trip generation exercise for the proposed developments, which we have reviewed and comment on where it is relevant to our original consultation response.

The following information has been provided to us by LCC:

- Pickering's Croft Analysis updated by LCC May 22 V5.xlsx ['the spreadsheet']

## Traffic Surveys

We have checked the traffic surveys used to determine the baseline conditions and peak hour identification within the spreadsheet.

In line with DfT Tag Unit M1.2 traffic surveys should be carried out during a 'neutral' or 'representative' month avoiding the main and local holiday periods. A neutral period is defined in DfT Tag Unit M1.2 to be Monday to Thursdays from March through to November (excluding August) provided adequate lighting is available and avoiding all weeks before/after Easter, the Thursday before and all of the week of a bank holiday, and the school holidays.

Is it noted within the spreadsheet that the surveys were carried out on the following dates:

- Wednesday 4th July 2018
- Tuesday 13th September 2018
- Wednesday 14th September 2018

We therefore conclude that the traffic surveys were carried out during a 'neutral period' in compliance with DfT Tag Unit M1.2.

National Highways can confirm that we have not identified any issues with the survey data included within the spreadsheet.

## Committed Developments

We have reviewed the flow diagrams for each of the committed developments for the AM and PM peak periods. LCC have stated that the committed developments included are consistent with those requested by SRBC, which we therefore have accepted.

It should be noted that committed developments are a matter to be agreed with the Local Highway Authority/Local Planning Authority and not National Highways. However, we note that the number of trips forecast to enter/exit each of the sites are consistent across the flow diagrams, with all trips accounted for.

Within the spreadsheet, the following trip rates have been provided for the development:

*Table 1 Development Trip Rate*

Land Use: Houses	AM Peak 0800 to 0900		PM Peak 1700 to 1800	
	Arrivals	Departures	Arrivals	Departures
Trip rate per unit	0.15	0.43	0.34	0.24

It is not stated within the spreadsheet what criteria has been used to derive the trip rates and whether these trip rates are vehicle only or all-person trip rates.

In order to validate the rates used, we have interrogated TRICS to derive rates for the proposed development to determine if those provided in Table 1 are appropriate.

We have applied the following criteria to TRICS:

- Land Use: 03 Residential A – Houses Privately Owned
- Regions – all excluding Greater London, Scotland, Wales, Northern Ireland and the Republic of Ireland
- Locations – Edge of Town and Neighbourhood Centre
- Date of Survey – 01/01/2017 to 23/11/21

We derived the following trip rates from TRICS, shown in Table 2.

Table 2 WSP Trip Rates

Land Use: Houses	AM Peak 0800 to 0900		PM Peak 1700 to 1800	
	Arrivals	Departures	Arrivals	Departures
Trip rate per unit	0.15	0.34	0.32	0.15

**National Highways therefore accepts the trip rates used by LCC as appropriate for the development proposals.**

**TEMPRO Traffic Growth Factors**

We have reviewed the TEMPRO factors provided by Lancashire County Council for 2018-2035, although we have been unable to exactly replicate the factors (due to a difference in Temprow dataset versions) we consider that the input parameters used are appropriate.

**National Highways have discussed with LCC the approach taken to derive the TEMPRO rates and consider the input parameters to be appropriate.**

**Census Data**

We have reviewed the 2011 Census Journey to Work Data (WU03EW – Location of usual residence and place of work by method of travel to work MSOA level) for the place of work Middle Super Output Area South Ribble 006.

**We accept that data used as being appropriate for this proposed development.**



## Trip Distribution

We have reviewed the trip distribution which uses 2011 Census Journey to Work Data (WU03EW – Ribble 006). We have reviewed the routing used and accept those used to be appropriate for each census tract.

**National Highways consider the trip distribution to be appropriate for use.**

## Traffic Impact on the SRN

We visited the M6/M65 interchange on Wednesday 29<sup>th</sup> June 2022 during the evening peak hour in order to observe the current operation of interchange. No extensive queuing was observed that blocked back to neighbouring junctions or onto the M6 mainline.

Based on an assumption of 1,100 dwellings, the proposed development will generate 608 two-way trips in the AM peak and 614 two-way trips in the PM peak.

The forecast number of additional trips at the M6/M65 interchange as a result of the proposed development are shown in Figure 1 and Figure 2.

Figure 1 AM Peak Development Impact on SRN

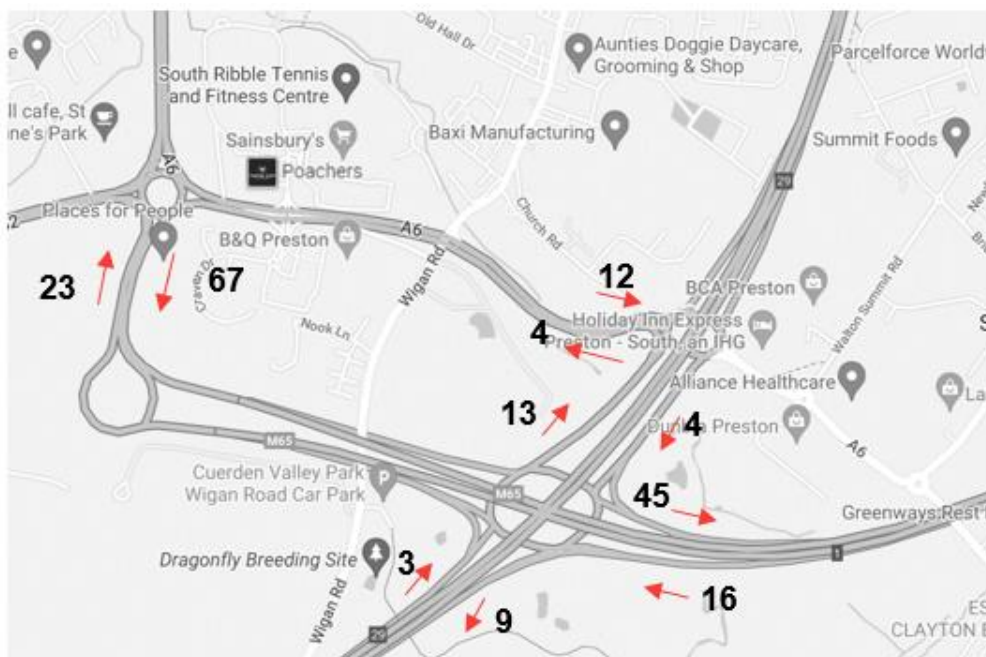
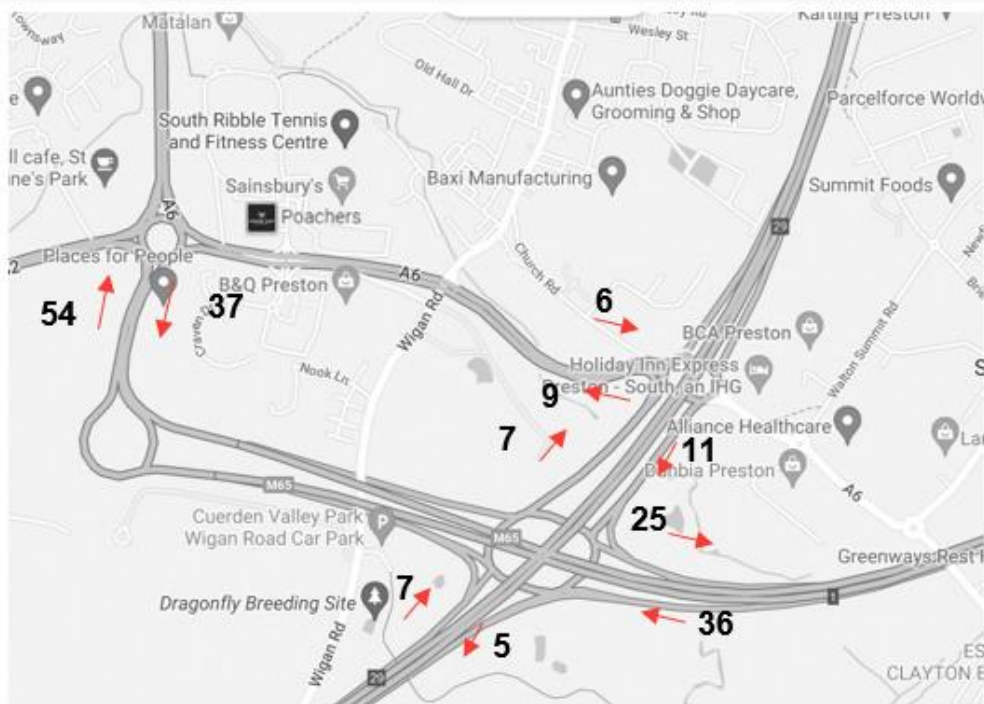


Figure 2 PM Peak Development Impact on SRN



In the morning peak period 61 passenger car units (PCU) are forecast to pass through the M6/M65 junction (45 eastbound and 16 westbound) to/from Blackburn. 29 PCU are forecast to use the interchange entering or leaving the M6, this equates to only 1 PCU every 2 minutes. 16 PCU travel through the M6/A6 junction equating to only 1 PCU every 4 minutes.

Similarly in the evening peak period, an additional 61 PCU are forecast to travel through the M6/M65 Junction (25 eastbound and 66 westbound). An additional 1 PCU every 2 minutes are forecast to travel to/from the M6, 30 PCU in total. Finally, 15 PCU are forecast to use the M6/A6 junction, 1 PCU every 4 minutes.

At this level of traffic impact, we consider that the impact on the M6 and M65 as a result of the proposed development in would be negligible.

### Safety Analysis

National Highways has reviewed the accident history of the extent of the SRN covering M6 Junctions 29, 29a and terminus of the M56 (including the part-roundabout that is a part of the Local network) over the most recent 6 year period 2016-2021. The numbers of recorded incidents by severity for this period are shown below:

	2016	2017	2018	2019	2020	2021	Total
Serious	1	1	3	1	1	1	8
Slight	14	5	11	0	6	5	41
Total	15	6	14	1	7	6	49

Over this period, the general trend is towards of reduction in accidents, and there have been no fatalities recorded.

We have looked at the causality factors behind the safety record of each junction and they are characteristic of junction locations of this type, with the majority of accidents being due to loss of control, and shunt-type incidents.

National Highways is of the view that the SRN likely to be most impacted by traffic from this development does not have a particularly poor accident record and is typical for motorway junctions.

**Given the level of anticipated additional traffic movements generated by this site, we would not expect this situation to change significantly, although it is to be acknowledged that increases in traffic are likely to increase the likelihood of vehicle collisions, all things being equal.**

## Conclusion

National Highways' view is that, as far as the SRN itself is concerned, the traffic impact of the development would be unlikely to be classed as severe within the context of DfT Circular 02/2013 or result in a material detrimental to existing levels of safety. Consequently, National Highways would have no objection to the aforementioned planning applications, currently subject to appeal, coming forward from the perspective as the operator of the SRN.

We hope that you will find our observations helpful.

Yours sincerely,

*Warren Hilton*

Warren Hilton

North West Spatial Planning Team