



Appendix 17 - Statement of Consultation
Highway comment on consultation responses to the
Draft Wyre Local Plan

December 2017

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Executive summary

Lancashire County Council (LCC) as Local Highway Authority (LHA) has considered the comments raised to Wyre Borough Council's (WBC) published Draft Local Plan on highway matters including the evidence prepared by LCC.

LCC's advice to WBC is that the plan should be put to the Inspector for Examination in Public without amendment with regards to highway matters.

Section one - Introduction

Lancashire County Council (LCC) as the Local Highway Authority (LHA) provided highway evidence relating to the Local Highway Network entitled "Implications for housing development within the proposed Wyre Local Plan" in February 2017. This then provided part of the evidence base for the publication of the Draft Wyre Local Plan.

In preparing the evidence LCC as LHA considered its responsibilities for providing and maintaining a safe and reliable highway network and through its role as a statutory consultee on planning applications highlighted the A6 corridor as an area, due to the scale and number of applications, where severe congestion was likely to occur unless a significant transport intervention occurred. This led to the development of the A6 Barton to Garstang Sustainable Transport Strategy. The Strategy is reviewed as development proposals come forward.

LCC consider the work undertaken to establish their views on network capacity to be robust. In predicting future capacity for M55 J1 (a key junction on the A6 corridor and a limiting factor to development) LCC undertook "LINSIG" modelling taking on board committed development and highway improvements / schemes such as follows;

- Preston Western Distributor and East West Link with a new junction 2 on the M55.
- Broughton by-pass with the provision of 4 south bound lanes to Broughton roundabout.
- Widening of both M55 junction 1 motorway (off) slip roads from 2 to 3 lanes.
- The provision of a new link road between D'Urton Lane and Eastway as part of the Story Homes development.

For development that is influenced by the limitations of the A585 LCC relied on the work undertaken by HE and the Poulton Congestion Study.

Wyre Borough Council (WBC) as the Local Planning Authority (LPA) invited representation on the Draft Wyre Local Plan between 22 September and 3 November 2017.

A number of representations have been made to the Draft Wyre Local Plan which comment on or query the highways evidence.

The following sections contains a summary of the response which contain highway related matters, LCC's responses to the comments and issues raised.

LCC has considered in depth the representations made on the Draft Wyre Local Plan and have taken them into account in this note.

Section two – Representation and Comments made to the LPA

This section summarises the representations to the LPA that LCC consider necessary to comment on.

2.1 White Young Green on behalf of Wainhomes. (Ref 0794b/P/08/C)

2.1.1 White Young Green (WYG) have presented a short document headed "*Lambs Road, Thornton: Proposed Residential Development Highways Representation on Publication Draft Wyre Local Plan.*"

2.1.2 The representation is in relation to site SA1/2. Part of this site has an extant outline planning permission for 165 dwellings. A reserved matters application has been submitted for 157 dwellings.

2.1.3 WYG claim to demonstrate that:

- A safe and suitable access can be achieved for the allocation site by all modes of transport from Lambs Road or via a new link road passing through Green Belt land.
- The allocation site would be very accessible by sustainable travel modes.
- Any adverse traffic impacts of development on the wider site can be suitably mitigated, where necessary.

2.1.4 WYG conclude that it "*is our considered view that the LCC and HE modelling work is not robust enough to enable Wyre Council to make an informed decision on the likely future capacity of the local highway network.*"

2.2 Cass Associates on behalf of Redrow. (Ref 0930/P/07/C)

2.2.1 Cass Associates have submitted representation, with a simple note, with regards to a site which is excluded from the emerging plan. The note by SCP is titled a Transport Assessment but simpler as the detail is excluded.

2.2.2 The note is provided to support a development of c200 dwelling on land off Stanah Road, Thornton. The land is located immediately northeast of SA1/2.

2.2.3 The note states "*Wyre's emerging new Local Plan will set out a vision for growth and development of the borough to 2031. The emerging Wyre Local Plan is still*

in preparation stage. Thus, the 'saved' policies of the Wyre Local Plan 1999 (WLP), which was adopted in July 1999, apply to the Site location."

2.2.4 The note assesses the impact of the development taking into account existing highway conditions, committed developments and traffic growth.

2.2.5 The note alludes that the site would be accessed via Stanah Road and junctions will operated within capacity.

2.2.6 The note concludes that that *"the proposals are acceptable from a traffic and transport perspective and there should be no reasons to resist the grant of planning permission on these grounds."* It is evident that the note was prepared to support a planning application rather than comment on the Local Plan. No planning application has been submitted as yet with respect to this site.

2.3 Cass Associates on behalf of Mr Daniel Fowler. (Ref 0929/P/06/C)

2.3.1 Cass Associates (CA) provide comment on the draft Wyre Local Plan and promote a site that has been excluded. The site is located south of Garstang town centre off Castle Lane.

2.3.2 CA *"do not believe that the Plan has been positively prepared or is justified. A consequence of this is that a pattern of new development is proposed which is not sustainable"*.

2.3.3 CA state that *"The assumptions in the strategic traffic assessment that lead to Garstang being placed in the zone of severe restriction are not altogether sound for the following reasons:*

1. *Firstly, Garstang is a higher order settlement with a good range of services and facilities together with employment opportunities. The propensity for new residents to travel to Preston in peak hours is likely to be less. Residents in new development at Garstang will be less reliant on trips along the A6 towards Preston in peak hours. This is not the case for new residents in the smaller settlements.*
2. *There is an alternative route to the trunk road network from Garstang which avoids Junction 1 of the M55. This alternative is Junction 33 of the M6. The route along the A6 to the north of Garstang is less congested. It provides convenient access to the M6 corridor.*
3. *Public transport routes and services in this part of Wyre are centred on the town of Garstang. The likelihood of public transport patronage in Garstang will be greater than in the smaller settlements. Bus travel*

is a realistic option for the new residents in Garstang. This will help to mitigate the potential for congestion on the A6 corridor to the south of Garstang."

- 2.3.4 CA also state that there *"is no automatic relationship between new housing in Garstang and impacts on Junction 1 of the M55. Trips within the town, the use of alternative routes and the reasonable availability of bus services will mitigate any impacts"* and there *"is a strong case to reconsider the overall Development Strategy. Garstang is the dominant settlement in the east of the borough of Wyre. It needs to be given an opportunity to grow beyond the limited extent suggested in the draft development plan. It is for this reason that we are promoting a sustainable location near to the core of Garstang. This will function as a well-integrated extension to the urban area – it is the land at Castle Lane (adjoining Spalding Avenue). The allocation of this land for housing will be consistent with the principle set out in the draft policy SP1 – to meet future development needs through sustainable extensions."*
- 2.3.5 CA go onto detail on how the site at Castle Lane *"is a well contained and well defined area of land on the eastern margin of Garstang. The location of the land, its context and the constraints around the land are shown on the plan which accompanies this statement – plan 1172-007 (Housing Development Opportunity)."*
- 2.3.6 CA state that the *"sites at Garstang where housing allocations are proposed are to the west of the A6. These are separated from the town by the A6 Corridor itself and are some distance from the facilities and services (including retail) at the core of Garstang. It will be challenging to integrate development on the western fringe into the grain and fabric of Garstang"* and that in *"contrast, our site is in easy walking distance of the range of services and facilities in the town centre, including retail and educational facilities and potential employment opportunities"*. Concluding that development *"at this location will be more sustainable and will be better incorporated into the urban structure. In our view, the site is the highest ranking option for a sustainable urban extension in Garstang"*.

2.4 Smith & Love Planning Consultants Ltd on behalf of Applethwaite Ltd. (Ref 0944/P/03/C)

2.4.1 Smith & Love Planning Consultants Ltd (SLPC) suggest / imply that the Draft Wyre Local Plan to be unsound and raise concerns on not delivering the full quota of *"objectively assessed housing needs figure of 9,800 net additional dwellings over the plan period"*.

2.4.2 With regards to highway matters SLPC raise the following;

- How "severe traffic congestion" is defined in terms of quantum and duration,
- The soundness of the desktop assessments made by the LHA and the methodology used to determine the recommended 'housing cap',
- The effects of future road improvements that have been committed or final designs announced since February 2017 when the highways evidence was prepared, and
- Trends in long term societal car use and, emerging technologies and working patterns.

2.4.3 SLPC contend that site SA1/8 land south of Blackpool Road has potential to deliver a significantly higher number of dwellings than the proposed figure of 154.

2.5 Lichfields on behalf of Taylor Wimpey UK Ltd. (Ref 0363/P/15/C)

2.5.1 Lichfields make representations in the context of Taylor Wimpey UK Ltd (TW) land interest in Cockerham Road, Garstang which is, in part, allocated for housing development (Site Ref. SA1/16).

2.5.2 Within their section on Development Strategy Lichfields state that *"TW is concerned that the settlement hierarchy fails to properly reflect this objective, particularly in terms of limiting the percentage of new housing development apportioned to Garstang over the plan period to 10% of the Borough's total. It therefore **objects** to Part 2 and Part 3 of Policy SP1. The reasons for this are threefold:*

- 1 *Garstang is identified within the evidence base as a sustainable settlement and has the capacity to support a higher quantum of development;*

- 2 *Garstang is a strong housing market area and a sustainable location for development; and,*
- 3 *There are areas of Garstang that are not constrained by the prevailing highways and flooding issues."*

2.5.3 Within their section on Accessibility and Transport Lichfields state that TW "broadly support" the provisions set out in Policy CDMP6(2), however, TW **object** to the requirement for new developments to make provisions for Electric Vehicle Recharging points.

2.5.4 Lichfields make comment on Policy SA1/16 which relates to land west of Cockerham Road, Garstang stating that TW strongly support the allocation of this land, however, *"TW wishes to object to the exclusion of the wider land, identified at Appendix 3, from the draft allocation. The principal reasons for this objection are:*

- 1 *The Local Plan has not ensured that sufficient deliverable land is allocated to meet the Borough's OAHN in full;*
- 2 *The wider site is not constrained by any technical or environmental constraints; and,*
- 3 *The entire site is well contained and represents logical and sustainable site for residential development."*

2.5.5 Lichfields state that *"TW urges the Council to revisit the boundaries of the proposed allocation on land west of Cockerham Road to include the wider area of land to the north and west. When taken together, these two parcels of land form a logical extension to the settlement of Garstang and have the capacity to deliver c.150 extra units which equates to 9% of the 1,356 dwelling shortfall."*

2.5.6 Lichfields state that the *"Traffic & Transport Note appended to these representations considers whether the transport infrastructure in the area could accommodate additional development over and above the 100 units currently allocated (i.e. the wider site being promoted by TW - see plan at Appendix 3). The Note demonstrates that Garstang is a sustainable location and there is capacity, or the opportunity to increase capacity, on the Strategic Road Network and Local Highway Network, and that the quantum of development currently allocated at land to the west of Cockerham Road could be increased. In particular, it makes reference to the package of highways improvements which would provide additional capacity at Junction 1 of the M55, along with the benefits associated with the Preston Western Distributor Road and Broughton*

Bypass. It also notes that Lancashire County Council has developed a package of improvement measures that recently approved schemes will be required to contribute towards the mitigate traffic impact on the local highway network."

2.5.7 Lichfields also assert that M55 J1 is not a key constraint for development.

2.6 **Barton Willmore on behalf of Story Homes. (Ref 0808/P/24/GC)**

2.6.1 Barton Willmore (BW) report that the principal concerns of Story Homes (SH) relate to the assessment of housing need, definition of the housing requirement and distribution of development. BW also report that SH have concerns to other matters including Accessibility and Transport (Policy CDMP6).

2.6.2 BW report that SH *"believes that the Council should meet its identified housing need in full. Story Homes do not believe that the highways constraints of the Borough are of such magnitude that this warrants a cap to the level of development which takes place over the plan period"* and that *"distribution of development proposed provides for an insufficient amount of development within Poulton-le-Fylde. Poulton-le-Fylde is one of the main settlements within the Borough, with a good range of services, facilities, shops and employment opportunities, as well as excellent public transport links. In view of this and the critique of Lancashire County Council highways evidence by Vectos (submitted alongside this paper), Story Homes believes there is justification for the amount of development to be allocated at Poulton-le-Fylde to be increased."*

2.6.3 BW state that SH *"has land interests at Land off Oldfield Carr Lane, Poulton-le-Fylde. The Site is currently not identified through the local plan for development and is within the open countryside. Story Homes however considers that for reasons of soundness; to secure an effective Local Plan, and one which is consistent with National Planning Policy, the Site should be allocated for 350 dwellings within the Local Plan. This would assist the Council in meeting its identified objectively assessed housing needs in full, and provide for a greater proportion of development at Poulton-le-Fylde, a settlement in need of and with the opportunity for further development within the plan period. The Site is considered deliverable within the plan period, and subject to minimal constraints."*

2.6.4 Under the heading of Housing Requirement (para 3.8 onwards) BW state *"The Council do not propose to meet its identified housing need in full, electing instead to provide for 86% of this resulting in a shortfall of 1,356 dwellings. The Council rationalise that this shortfall in housing provision is justified on account of evidence of highways constraints within the Borough. This evidence has been prepared by Lancashire County Council (LCC), and finds a maximum housing requirement for each settlement taking into account deliverable improvements to the highway network."*

2.6.5 BW report that the report conducted by Vectos concludes that;

- *The evidence and resultant limitations on housing numbers is based on limitations within the strategic road network within the Peninsula Corridor and M55 Junction 3. Given this identified limitation surely the approach of the Council should be to seek to improve capacity at this junction and concentrate growth towards the most sustainable and accessible locations via public transport;*
- *The evidence focuses on the impact on the strategic road network caused by commuters into and out the Borough. This ignores that fact that a large proportion of commuters travelling out from Wyre (particularly at Poulton-le-Fylde) travel to Blackpool and as such would not use the strategic road network;*
- *The data and traffic modelling used to inform highway capacity is not comprehensive and in part rudimentary;*
- *It is not known whether funding commitments to improve Junction 3 of the M55 and the Norcross Roundabout have been included within the assessment;*
- *The modelling process does not include public transport, with trip rates examined failing to reflect a sustainable site which is close to public transport and local amenities;*
- *For Poulton-le-Fylde the Technical Report for the Poulton-le-Fylde Congestion Study is not published meaning that it is difficult to examine the conclusions made in relation to congestion pinch points, or to what extent this is addressed by the Poulton Mitigation Strategy; and*
- *On a site-specific basis within Poulton-le-Fylde, there is an apparent failure to consider how bus provision, proximity to services and the railway station might serve to relieve car usage allowing for a greater capacity at these sites.*

2.6.6 BW make reference to Public Rights of Way and Electric Charging Points and that SH is *"concerned by the weight attached by the emerging Local Plan to Public Right of Ways"* and the *"justification for and effects of the requirement for electric charging points where developments include parking provision."*

2.7 Vectos on behalf of Story Homes. (Ref 0808/P/25/GC)

- 2.7.1 Vectos have prepared a Transport Briefing Paper on behalf of Story Homes for the site that they are promoting off Blackpool Road, Poulton. The land is identified as site SA1/8 within the published Draft Wyre Local Plan.
- 2.7.2 Story Homes are advocating an allocation of 460 dwellings for site SA1/8 as opposed to the 154 dwelling in the draft.
- 2.7.3 The Transport Briefing Paper concludes that *"the proposed site would offer a sustainable location for residents to live and that there is scope for a package of sustainable transport measures to be developed to support accessibility of the site by sustainable modes, and for some highway improvements to help traffic movement through the town centre."*
- 2.7.4 Vectos state that site SA1/8 could accommodate up to 657 dwellings using comparable trip rates previously accepted by LCC and that the model used by LCC is not robust.

2.8 PWA Planning on behalf of J Townley Ltd. (Ref 0956/P/03/C)

- 2.8.1 PWA Planning (PW) make representation on behalf of J Townley Ltd and their land interests south of Harrison Cottage, Bilsborrow Lane, Bilsborrow. The land is not included in the published Draft Wyre Local Plan.
- 2.8.2 PWA question the absence of housing allocation in Bilsborrow, which is identified as a "Main Rural Settlement" (along with Pilling, Barton, St Michael's, etc) especially when Barton to the south is allocated a total of 132 dwellings.
- 2.8.3 PWA consider that *"the failure of the Council to make any specific housing land-use allocations within the settlement of Bilsborrow is inappropriate, given the scale and significance of the settlement. It is therefore considered that the local plan is **unsound** on the basis that it is not **'positively prepared'** in that it is not demonstrated that it is prepared based on a strategy which will meet needs, consistent with achieving sustainable development"* and in order to rectify this situation, *"it is requested that additional land use allocations, specifically for residential development, are made."*

2.8.4 PWA wish to see the lowering of the minimum threshold of 25 dwellings for inclusion in the plan.

2.8.5 PWA state that the *"bulk of the highways evidence originates from February 2017 and there have been significant changes since then that suggest this data needs to be revisited if it is to form the part of the evidence base of the Local Plan "*

2.9 **De Pol Associates Ltd on behalf of Metacre Ltd. (Ref 0962/P/04/GC)**

2.9.1 De Pol Associates Ltd (DPA) make representations on behalf of Metacre Ltd whom have interest in allocation sites SA3/3 (land west of Gt Eccleston), SA1/13 (Inskip extension) and SA1/10 (north of Garstang Road, Pilling).

2.9.2 DPA state in respect of SA3/3 that;

- a) *The land to the east / south of Copp Lane should either be separated from the main mixed use allocation and instead identified as a stand-alone housing allocation under policy A1'Residential Development', or policy SA3/3 should clarify that this land can come forward in advance of the wider masterplan and the provision of the through vehicular route between Copp Lane and the A586;*
- b) *The remainder of the SA3/3 allocation to the west / north of Copp Lane should be extended to include the land to the south.*

2.9.3 DPA state that Metacre Ltd offers *"full support to the proposed settlement extension at Inskip, ref. SA1/13, although it is considered that there are opportunities for this allocation to be extended"*.

2.9.4 DPA point out that the proposed settlement extension, ref. SA1/13 seeks the delivery of 255 dwellings together with the creation of a new village green and the provision of land to allow an extension to the existing primary school. However they consider that *"the delivery of a further 200 dwellings in Inskip, above existing commitments, will ensure both the retention of existing local services and facilities, as well as the delivery of new services/facilities in line with NPPF Paragraph 28."*

2.9.5 DPA state that Metacre Ltd *"offers full support to the Council's proposed allocation at land north of Garstang Road, Pilling, LP ref. SA1/10."*

2.10 Blackpool Council. (Ref 0032/P/04/EB)

2.10.1 In relation to highway matters Blackpool Council remains concerns *"about the traffic impact of Wyre's proposed development (on the peninsular in Wyre, Over Wyre and further east on the A586 corridor) as it has the potential to overload key sections of Blackpool's highway network. The A586 intersects with the A587 at what is a very sensitive part of Blackpool's road network."* and *"Blackpool Council looks forward to productive dialogue with Wyre Council and Lancashire County Council (LCC) as to how this impact can be best mitigated. Particular areas of concern include the A587, A586, A583, B5268 and B5266".*

2.10.2 *Blackpool Council supports proposals documented in Appendix C of the Publication Draft, including those to address car parking issues in Poulton-le-Fylde town centre and hope they can assist railway station users who require long-stay car parking (the issue acknowledged at paragraphs 2.8.4 and 2.9.16 of the document). However, delivery mechanisms could certainly be clearer; Appendix C refers to 'DS_5'; it is not clear what or where this is.*

2.10.3 In December 2017 Blackpool Council have provided LCC with a LINSIG model of the A586 Poulton Road / A587 Plymouth Road junction which shows that the junction is operating at capacity in the peak hours.

2.11 Fylde Council. (Ref 0298/P/03/EB)

2.11.1 Fylde Council state that the *"highways evidence that has been produced to support the plan, and the plan itself, do not take adequate account of the committed Highways England major scheme for the Windy Harbour to Skippool section of the A585, which is the major trunk road which provides access to the peninsula."*

2.11.2 With regards to development off the A6 corridor, Fylde Council state *"the A6 Broughton Bypass is now open, between the A6 corridor within Wyre and Junction 1 north of Preston. Although an assessment was made of the likely*

effects within the LCC Highways study, there is now the opportunity for a reassessment to consider the effects of the new route on actual movements. Previous reassessment of this corridor, supported by a consortium of housing developers, has resulted in the highways “cap” for the Barton to Garstang section being increased from zero (in the May 2016 draft highways evidence) to the current figure.”

2.11.3 Fylde Council state that the *“LCC Highways study does not itself present a detailed assessment of Poulton, but carries recommendations from the Jacobs Poulton Congestion Study. This document has never been published and is known to have been subject to successive redraftings. As it has been used to provide evidence that is directly relevant to issues of soundness of the Local Plan, there is an expectation that it would be published as part of the Local Plan evidence base, both in the form that fed into the LCC study, and in any final version that followed.”*

**2.12 Smith & Love Planning Consultants Ltd on behalf of Telereal Trillium.
(Ref: 0953/P/08/C)**

2.12.1 Smith & Love Planning Consultants Ltd (SLPC) state that Telereal Trillium raises a concern in the inability of the Local Plan meet, in full, the housing needs over the plan period.

2.12.2 SLPC accept that there are insurmountable environmental constraints and raise questions on;

- *How “severe traffic congestion” is defined in terms of quantum and duration within the plan period for the purposes of Paragraph 34 of the Framework.*
- *The soundness of the desktop assumptions made by the local highway authority and the methodology used to determine the recommended “housing cap”.*
- *The effect of future road improvements that have been committed or final designs announced since February 2017.*
- *Trends in long term societal car use, emerging technologies and working patterns.*

2.12.3 SLPC state that Telereal Trillium seek to extend site allocation SA1/11 (land north of Norcross Lane, Norcross) to deliver additional housing numbers.

2.13 Smith & Love Planning Consultants Ltd on behalf of Mr Rob Parkinson. (Ref: 0948/P/02/C)

2.13.1 Smith & Love Planning Consultants Ltd (SLPC) in their response for Mr Parkinson repeat the concerns raised by their other clients (2.4 & 2.12) on the inability of the Local Plan meet, in full, the housing needs over the plan period.

2.13.2 SLPC repeat the same questions raised by their other clients.

2.13.3 SLPC state that Mr Parkinson wishes to see site allocation SA1/17 (land to the west of the A6, Garstang) extended to deliver greater housing numbers.

2.14 De Pol Associates Ltd on behalf of Wainhomes. (Ref 0794a/P/02/C)

2.14.1 De Pol Associates Ltd (DPA) make representations on behalf of Wainhomes whom have interest in allocation site SA1/9 (land south of Stalmine), part of which has an extant planning permission for 77 dwellings.

2.14.2 Wainhomes wish to see site allocation SA1/9 extended to the west providing around 65 additional dwellings.

2.14.3 DPA state that *"the highway evidence submitted with these representations demonstrates that there would be no significant residual cumulative transport impact on the local and wider highway network as a result of the additional allocation"*.

2.14.4 The additional highway evidences that DPA refer is a technical note produced by White Young Green entitled "Proposed Residential Development, Carr End Lane, Stalmine – Highways Representation on Publication Draft Wyre Local Plan".

Section three – LCC Strategies

This section provides an update on various changes that have taken place and could be deemed to have impact on the delivery of the housing strategy for Wyre.

3.1 Changes to Public Transport

3.1.1 Since providing comment in February 2017 LCC have reviewed their tendered services. This has led to a number of service changes throughout Lancashire. LCC funding to subsidise Public Transport services is subject to ongoing review and change.

3.1.2 At recent appeals for sites in Elswick within the borough of Fylde the Inspector stated *"it is clear to me that the viability of existing bus services are subject to review, and a contribution to support acceptable levels of service, to provide continuing realistic alternatives to reliance on the private car for residents of the development, is both necessary and proportionate."*

3.1.3 LCC where appropriate in line with CIL test seek contributions from developers. However, in addressing accessibility and sustainability issues of a development site a simple diversion or extension to a service may not always be suitable or sufficient especially if this adversely impacts on overall journey service time's negatively influencing patronage elsewhere.

3.2 Broughton Bypass - update

3.2.1 Broughton Bypass opened on 5th October 2017, its purpose was to provide relief to Broughton crossroads, accessing the A6 north and south of the village, and improve connectivity / sustainability within Broughton.

3.2.2 The bypass benefits to the wider A6 corridor are limited (between M55 J1 and Cabus) from a capacity perspective. Having regard to the LCC produced A6 (developer funded) strategy and the sustainability / safety provision within it does not provide additional highway capacity.

3.2.3 LCC contend that the bypass benefits Broughton whilst other parts of the A6 corridor remain congested and M55 J1 remains a pinch point.

3.3 A6 Barton to Garstang Sustainable Transport Strategy.

3.3.1 The A6 Barton to Garstang Sustainable Transport Strategy was developed to facilitate development by promoting the use of sustainable transport modes and encouraging a modal shift. It also is focused on promoting safer and healthier travel. To accommodate the additional traffic movements that would arise as a result of development capacity improvements would also be required.

3.3.2 The Strategy comprises of a number of measures that facilitate safe movement on the strategic highway network as well as safety / capacity improvements at key locations along the network including M55 J1.

3.3.3 The Strategy is to be funded by developers as highlighted in the statutory comments dated 22 November 2016. The majority of the development proposal in this response have a "minded to" approve resolution subject to the developer completing s106 agreements, many of the agreements being close to completion.

3.3.4 The statutory comments provided on those applications took account of the constraints to housing numbers that LCC considered to be appropriate in the draft local plan. Remodelling of M55 J1 has been carried out a number of times, since February 2017, each time reviewing the level of committed and proposed developments that will influence the operation of this junction. The results of the remodelling continue to demonstrate the M55 J1 is a major pinch point and there is no justification for LCC to change its views from those provided in the February 2017 highways evidence.

3.4 M55 Junction 2 / Preston Western Distributor - update

3.4.1 M55 Junction 2 and the Preston Western Distributor road gained approval at LCC's Development Control Committee on 4th October 2017.

3.4.2 Funding of this scheme is as a result of funding from central government, via the Preston, South Ribble and Lancashire City Deal.

3.4.3 In producing the February 2017 to WBC on the emerging local plan LCC included the redistribution influence that this scheme would provide. LCC's position on network capacity remains unchanged with the certainty that the scheme will be delivered (with an estimated opening year of 2022). As M55 J2 etc has been accounted for in the M55 J1 modelling no future benefits can be released. LCC has considered impact of NW Preston and other commitments and influences in Ribble Valley and Fylde.

3.5 D'Urton Link Road - update

3.5.1 The D'Urton link road is developer delivered, commencement is anticipated in 2018. LCC cannot control its delivery or opening for public use.

3.5.2 The modelling for M55 J1 takes into account the predicted benefits of the D'Urton link road.

3.6 A585 Windy Harbour to Skippool

3.6.1 In October 2018 Highways England (HE) announced the preferred route for the A585 Windy Harbour to Skippool improvement scheme. The scheme will require a Development Consent Order and there will be compulsory purchase orders needed. HE expect to be on site in March 2020.

3.6.2 The scheme will provide benefits in reducing congestion on this part of the trunk road network, however, it must be recognised that there are other sections of the trunk road network that suffer with delay and congestion.

3.7 Thornton development strategy

3.7.1 The level of development proposed on the Wyre peninsula was influenced by assessments undertaken using specialist software packages, Highway Analyst, the GraHAM toolkit and Saturn.

3.7.2 The distribution of traffic of traffic throughout the Wyre peninsula is constrained by congestion along the A585 strategic route. This in turn influences what level of development and where development can be supported.

3.7.3 The evidence provided to LCC in the formulation of a development strategy for the Wyre peninsula is therefore influenced by these constraint.

3.7.4 There are sections of the local highway network that have known traffic constraints and as such LCC believe that limited development can only be supported through a master planning approach in order to maximise the level of development.

3.8 Poulton development strategy

3.8.1 Poulton, whilst affected by the constraints on the strategic highway network, suffers with high levels of congestion. LCC have been aware of the limitations of the highway network in and around Poulton as a result of which LCC commissioned the Poulton-le-Fylde Congestion Study.

3.8.2 The study together with a number of planning submissions led to LCC formulating the Poulton Mitigation Strategy.

3.8.3 The Poulton Mitigation Strategy has been developed to facilitate development by promoting the use of sustainable transport modes and encouraging a modal shift. It also is focused on promoting safer and healthier travel. The Strategy suggests a number of highway improvements that combined has allowed LCC to support some limited development which is now largely committed apart from 154 dwellings. The Mitigation Strategy will be implemented through a combination of s278 highway improvements and s106 developer contributions.

3.8.4 A number of development sites that are proposed in the draft local plan have acquired planning permissions and are contributing towards the strategy. In order to support further but limited development LCC contend that all Poulton sites within the local plan contribute towards the Strategy.

3.9 Other Areas.

3.9.1 The level of development in rural areas is influenced by its impacts on the A585 or A6 and as such needs to be managed, so that development traffic does not over burden these key corridors.

3.9.2 Local highway constraints around Gt Ecclestone, for instance, mean that there are location where master planning is necessary to maximised development.

Note On key corridors LCC will be monitoring traffic and collecting traffic data in order to determine whether any traffic models need revisiting.

Section 4 – LCC's comment in relation to specific queries.

This section provides comment on specific issues raised which are not addressed in the preceding section.

4.1 General

4.1.1 The work undertaken by LCC and HE has been questioned (2.1.4) with regards to it being robust enough to enable WBC to make an informed decision on the likely future capacity of the local highway network. On this point LCC would state that the highway evidence produced in February 2017 is a desktop assessment. The broad brush approach of the desktop assessment is not as detailed as site specific Transport Assessments, however, in using congestion data, traffic count data, public transport information, accessibility appraisal, and engineering judgement the desktop assessment produces an indication on a reasonable quantum of development which can be supported, following mitigation that is likely to be deliverable having regard to the scale of development. LCC are content that their approach is sufficiently robust to justify the quantum of development suggested in the February 2017 evidence.

4.1.2 In relation to the questions regarding the definition of severe congestion (2.4.2, 2.12.2 & 2.13.2), LCC would highlight that they have defined this at page 19 of the February 2017 report;

The map shown in Figure 3 represents the output of the Highways Analyst programme.

The following parameters were applied when analysing the data:

Date range: 1st September 2014 to 31st August 2015, week days, term time only

Time periods: AM Peak (08:00 – 09:00) and PM peak (17:00 – 18:00)

Severe congestion (used in this study solely for the purposes of presenting an illustration of current network conditions and should not be used for the

purpose of defining severe impact in NPPF terms) definition: < 30% of free flow speed, during either peak

Congestion definition: 30% to 60% of free flow speed, during either peak

- 4.1.3 LCC supports the provision of Electric Charge Points (ECP) (2.5.3 & 2.6.6) within housing development which are in line with government initiatives. Whilst LCC do not currently have a policy on the provision of ECP's there are plans in place to deliver a number of ECP's at a number of key locations throughout Lancashire. Providing ECP's within residential would further reinforce current strategy on delivering ECP's
- 4.1.4 In carrying out their assessment of land allocations LCC considered the likely distribution patterns of traffic. These assumption were based around traditional methods such as being based on census data and existing traffic flows. Without drilling down to site specific assessment this methodology is considered by LCC the most appropriate methodology for a strategic overview of development and thereby rebuts the issues raised in points 2.3.3 and 2.6.5.
- 4.1.5 In response to queries relating to long term societal car use and emerging technologies (2.4.2 and 2.12.2) LCC would state that the assessment tools to predict traffic growth and traffic generation are nationally recognised as the appropriate method for development assessment. Over time they will reflect and be absorbed charge that may occur due to new technologies, travel patterns and travel choices.
- 4.1.6 Proximity to public transport and it frequency is recognised as an important factor in making developments accessible. With this in mind LCC in their February 2017 evidence were mindful of this as well as the constraints that exist due to significant funding to subsidised services. Whilst sites that are in close proximity to public transport can have lower trip rates LCC in taking a broad brush approach did not examine trip rate to that sort of detail but used typical trip rates in order to build robustness in to its assessment.
- 4.1.7 A number of the comments received on the published draft Wyre local plan refer to trip rates and question the trip rates assumed by LCC for use in the February 2017 evidence and the trip rate accepted by LCC on historic planning application. On this matter LCC would state that a typical trip rate has been

applied rather than site specific trip rates as LCC consider this to be sufficiently robust to be used in their highways evidence. At the time of any planning application site specific trip rates will need to be provided and agreed.

4.1.8 LCC's highways evidence has relied in part on the Poulton Congestion Study which was carried out by LCC's framework consultants Jacobs. LCC have come under criticism as this study was not publically available. The study was substantially completed in December 2016 and reported on the highway network in Poulton up to that time. The study is to be made publically available in early 2018.

4.2 Poulton

4.2.1 The highways evidence provided by LCC limits development to levels below what Wyre have identified as necessary to meet their housing needs for the plan period. Whilst recognising the importance of housing needs LCC have a duty to ensure that the highway network remains safe and reliable.

4.2.2 Development in Poulton around Oldfield Carr Lane (promoted by BW –see section 2.6) has a number of constraints that would need to be overcome, these include congestion of the local network (Hardhorn Road and A586 Garstang Road East) as well as Poulton town centre. It is not considered that there are any obvious deliverable mitigation measures (beyond those LCC have identified in the Poulton Mitigation Strategy) and BW have not offered any. The Local Plan position was the maximum that could be achieved with deliverable mitigation.

4.2.3 The site promoted by Vectos (see section 2.3) increases the level of development within site SA1/8 beyond levels that even with intervention set out on the Poulton Mitigation Strategy would require additional mitigation. Vectos do not offer or identify any additional deliverable mitigation.

4.3 A6 Corridor

- 4.3.1 The site promoted by CA (see section 2.3) has a number of local highway constraints that would require third parties to overcome. Along with this it is LCC contention that traffic would have significant influence on the A6 corridor.
- 4.3.2 Castle Lane is a single track road and rural in nature. The existing highway limits are such that additional land adjoining the highway would be required in order to provide a suitable means of access, ie requires significant widening to provide safe access for all highway users, especially pedestrian. The additional land requirements needed to deliver a suitable means of access raise questions on viability and deliverability of this site.
- 4.3.3 A significant highway concern is that Castle Lane provides access to a local primary school.
- 4.3.4 CA promote this site over sites in the Draft Wyre Local Plan which lie to the west of the A6. In response to this LCC would point out that the site at Nateby Crossing Lane (west of the A6 and south of Croston Barn Road) has acquired a planning permission following a Public Inquiry.
- 4.3.5 LCC supported the Nateby Crossing Lane following agreement on significant sustainable transport mitigation measures being introduced in line with the A6 Barton to Garstang Sustainable Transport Strategy.
- 4.3.6 The February 2017 evidence places Garstang in the zone of severe restriction, and whilst there are a range of services within Garstang the evidence provided in support of development, by other developers, shows that there are currently significant levels of traffic travelling south towards M55 J1 and Preston based upon census data and that traffic from new developments would follow this trend. LCC agreed that this distribution was sufficiently robust to adopt this distribution for development proposals that followed.
- 4.3.7 CA assert that there "is no automatic relationship between housing numbers in Garstang and impacts on Junction 1 of the M55" (2.3.4). In response to this LCC would state that it is the cumulative impact of developments on the A6 corridor that has led to LCC's concerns and that in delivering a strategy to maximise development a piecemeal approach to development on a constrained network would not be appropriate.

- 4.3.8 With regards to Lichfields (see section 2.5) wish to see the allocation of SA1/16 extended, to deliver c150 additional dwellings, LCC would refer to the previous section which re-enforces the view that development which impacts on the A6 corridor needs to be limited and that the A6 Strategy aids in maximising development along this corridor.
- 4.3.9 The site off Bilsborrow Lane (promoted by PWA section 2.8) would impact on the A6 corridor despite its size.
- 4.3.10 CIL rules limit the collection of developer contributions to 5, which means that the pooling of contributions from small scale developments makes the delivery of the large scale improvements within strategies such as the A6 Strategy undeliverable.

4.4 Thornton

- 4.4.1 WYG (section 2.1) produced the highways evidence to support the existing development taking place at Lambs Road (site SA1/2) and are the consultants acting on behalf of a developer for a modest development (66 dwellings) on this site.
- 4.4.2 LCC are currently working with WYG on how to overcome the local constraints that prevent the whole allocation coming forward.
- 4.4.3. CA (section 2.2) do not clearly provide comment on whether this site (land off Stanah Road) should be included within the Wyre Local Plan at the expense of sites included within the Draft Wyre Local Plan publication or in addition to those that are included. With regards to a site access to Stanah Road (2.2.5), LCC are content that a suitable means of access could be provided and it can be delivered to operate within capacity, nonetheless the implications to wider highway network have not been considered.
- 4.4.4 The site location has similar influences and constraints as those within SA1/2.
- 4.4.5 The supporting note fails to take on board all of the local and strategic highway issues. Whilst comment on committed developments and traffic growth are mentioned, it does not address all the concerns of LCC on impact on the constrained local highway network. The note fails to comment on LCC's

concerns at Skippool Road around Thornton Hall and does not include reference to the emerging local plan and the allocations proposed in the draft.

4.4.6 CA comments do not take on board the need for a master planning approach to maximise development and as such implies a piecemeal approach will be taken. Further it provides no comments on delivery of changes necessary to support development.

4.4.7 LCC are of the opinion that the evidence provided by CA does not lead to them agreeing that additional land can be supported in Thornton to meet Wyre's housing needs

4.5 Others areas

4.5.1 LCC suggest that in order to release land for residential development around Gt Eccleston (site SA3/3) master planning is necessary. The suggestion by De Pol (2.9) to increase the quantum of development here cannot be supported because of other highway constraints which were identified in the highways evidence published in February 2017 in support of the draft Local Plan.

4.5.2 LCC have similar concerns over the increasing of any housing allocations around Inskip due to highway constraints.

4.6 Blackpool Council

4.6.1 The concerns raised by Blackpool over the A586 to the west of Poulton show that not only are there constraints to development around Poulton due to the existing highway issues within Wyre but potentially on the extended highway network beyond the Wyre borough boundary.

4.6.2 LCC have reviewed the LINSIG model that Blackpool provided for the A586 / A587 junction and are content that the output of the model are representative of the junction in that the junction currently suffers from a level of congestion. This reinforces LCC's view that development in Poulton needs to be limited not just because of constraints along the A586 in Wyre but also due to similar constraints in neighbouring authorities.

4.6.3 It is also of merit to highlight that the assertion by Barton Wilmore (2.6.5) that the highway evidence "*ignores that fact that a large proportion of commuters travelling out from Wyre (particularly at Poulton-le-Fylde) travel to Blackpool and as such would not use the strategic road network*" is misleading in that it implies that there are no other constraints on the highway network other than on the strategic network. Traffic that leaves Poulton via routes to the west (Blackpool Road and Blackpool Old Road) join the A586 prior to the A587 where the local network is constrained.

4.7 Fylde Council

4.7.1 Fylde Council's comment on the A585 Windy Harbour to Skippool improvement is noted, however, unless HE revisit their analysis there is no scope to increase housing allocations.

Section 5 – Conclusion.

Since producing evidence in February 2017 a number of events have taken place;

- Wyre's planning committee resolved to approve a number of planning applications on the A6 corridor (subject to s106 agreements) and the total quantum of development minded to approve does not exceeds the limits suggested by LCC.
- M55 J2 / Preston Western Distributor Road has a planning permission and funding is in place. This is now a committed scheme and the benefits it would provide to M55 J1 can only be assumed to be in line with the traffic models as there is no evidence to show that the model is flawed.
- Broughton bypass has opened. As the bypass only opened in October 2017 it is too early to gauge whether or not the predicted benefits have occurred. This can only be done through comprehensive data collection and analysis and whilst this will take place it is likely to be mid- late 2018 before judgement can be made on whether or not it has any influence on the extended A6 corridor.
- D'Urton Link Road whilst developer funded commencement is expected in 2018. This is not within LCC's control to deliver although the benefits of this scheme have been accounted for in LCC's assessment.
- A6 Barton to Garstang Sustainable Transport Strategy has evolved further and developers have agreed to contribute through s106 agreements and / or through s278 works.
- A585 Windy Harbour to Skippool improvement scheme has been announced by HE with them expecting to be on site in 2020. HE have not provided any updates to their analysis and as such LCC have no cause to change their evidence where the A585 is a constraint to development.
- The Poulton Mitigation Strategy has evolved and developers have agreed to contribute through s106 agreements and / or through s278 works resulting in development proposals being granted planning permission or Wyre's Planning Committee being minded to approve subject to the applicant entering a s106.

Despite the above changes LCC are not in a position whereby the evidence provided in February 2017 should be changed to allow a greater level of development to come forward. As such the February 2017 evidence is considered still to be relevant and sufficiently robust for determining the local plan.