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Your ref 2017/0492/ARM
Our ref D8/17/0492/ARM/DRW 1
Date 20 July 2017

FAO Ann Veevers

Dear Sir

Planning Application No: 2017/0492/ARM

Location: Henry Alty Ltd, Station Road, Hesketh Bank, West Lancashire, PR4 6SP

Description: Approval of Reserved Matters for the erection of 212 dwellings including associated infrastructure and landscaping and details of appearance, landscaping, layout and scale.

I refer to the above application and would like to thank you for the opportunity to provide further comment on this proposal.

LCC embraces a one team approach, working closely with developers and the planning authority to deliver high quality, sustainable development. With this in mind the present and proposed traffic systems have been considered to highlight areas of concern that, potentially, could cause problems for the public, cyclists, public transport and motorists.

These comments consider all the highways and transport information provided within the latest application documentation. LCC is aware that this latest application has come forward following the previous refusal of an earlier Reserve Matters application on this site, PA No. 2016/0279/ARM. LCC have provided considerable feedback on this application site throughout the iterative planning process. This includes comments provided during the outline application stage as well as for the previous Reserve Matters application. I understand these comments can be viewed on the relevant section of WLBC website. I make reference to this earlier correspondence as many of the issues being raised in these latest comments have previously been raised by LCC Highways

In summary

It is clear that the majority of the issues raised with the earlier RM application were never addressed to LCC Highways satisfaction and that this new application again provides a poor layout that appears to have little change from that previously considered unacceptable. To be clear, with consideration for the current layout, LCC

Highways will not adopt any of the development served off the second access (south of Mill Lane) and much of the site served of the main access does not meet our adoptable standards.

The parking provision is a real concern, for example, from the second access there are four bedroom properties that have only parking for one vehicle (they have only small garages which is not accepted by LCC as an adequate parking space). This will inevitably lead to parking on street – on the opposite side of the road as there is limited space available on the south side for parking outside these properties. This parking will inevitably be on footway and create safety issues for sustainable users which is unacceptable. Alternatively, parking wholly on street would severely restrict access into the site and also lead to road safety issues.

LCC Highways understand that the applicant dismissed those outstanding LCC Highways comments on the previous Reserve matters application and stated that all the roads (where issues were highlighted) were to remain private access roads.

LCC Highways would ask that the applicant put this in writing, in regard the current application, otherwise LCC would expect all matters highlighted below to be addressed should the applicant wish to offer the roads for future adoption.

Detailed Comments on the Latest Application

Clearly in dealing with this latest application on its own merits, I provide below identified issues with the current proposals, where I would again highlight in detail the areas of concern for LCC as local highway authority (LHA).

These comments below are made in relation to the latest Site Layout Masterplan dated 21/04/17 as presented on West Lancashire's planning portal.

The comments below are presented under two headings, these being

(A) Issues that require further information or clarification from the applicant; and

(B) Specific comments in regard to the internal layout of the site to aid social inclusion, the promotion of sustainable forms of transport, highway safety, reduce highway amenity issues and to reduce the impact on future highway maintenance that LCC Highways considered need to be addressed by the applicant.

(A) Issues that require further information or clarification from the applicant

(A)(i) - Land/parking issue at 264 Station Road (location of the phase 2 Access)

In regard to the previously RM application (2016/0279/ARM, I raised a concern with the layout at the Phase 2 Access location and what appears may be a possibly land dispute/issue at the southern entrance, relating to the following:

1. From observations on site and our mapping system the fence line at the rear of 264 Station Road is off set approximately 3.5m north of the gable wall.

2. From observations on site there is a private car parking area along the gable wall of 264 Station Road with an offset of approximately 8.3m north as set out by the existing low level brick wall and planting.
3. Private parking on an adoptable highway would not be permitted; what will happen to the parking associated with the above property;
4. The layout of the shared space immediately east of the second access is unacceptable, the footway on the south side should continue without detour with a direct straight connection, any land behind the footway would not be considered for adoption;
5. Is access required to the rear of these properties;
6. I consider that, once a layout has been agreed, there will be a need for TRO's at this site access entrance to prevent parking and resultant highway safety issues; this should be secured by condition;
7. Opposite the area shown as shared space (on the north side of the second access road) there is a ramp where the access to two existing properties have access – this is unacceptable.

I would ask that the applicant provide a clear response on the issues raised in (A)(i) above.

As presented, with consideration for the above, the proposals in this area remain unacceptable to LCC Highways given:

- The question raised in regard to possible land issues have not been answered;
- private parking on the adopted highway would not be permitted
- LCC would not wish to adopt the layout as shown and would require changes to provide an acceptable footway provision;

(A)(ii) – Access to the land for the Light Railway and Future Employment Site (and Parking for existing users (including the Light railway and the Fishing Club)

This Reserve Matters application follows on from the approved outline application No:2013/1258/OUT which was: *'...for erection of 275 dwellings (including affordable housing) across two phases: including associated garages, roads landscaping and public realm creation in the form of a Linear Park and B1 Employment uses. Detail of access included.'*

The current site layout Masterplan does not demonstrate that a safe and suitable access can be provided for the users of the future proposed employment site (approved in the outline application). The detail the applicant is seeking to agree here has implications for the access that is required for the employment site and should be addressed within this application.

I consider that further information is necessary and should be provided in regard to access to the future employment site.

The current site layout Masterplan does not demonstrate that a suitable access has been provided for the existing users of the Light Railway site (including consideration for large deliveries – HGV's carrying locomotive units or carriages) or access for visitors.

I consider that further information is necessary and should be provided in regard to access to the Light Railway site.

I consider that further information should be provided in regard to parking for the Light Railway users/visitors and Fishing Pond users (Fishing Club members). It was clearly stated at the outline stage and picked up by condition 16 that a Parking and Management Strategy was required. If this plan and RM application is approved without addressing the parking and access issues raised above then it may be difficult at a later stage to get an appropriate and acceptable solution that would allow LCC Highways to recommend discharge of these conditions - I consider that further information to address potential concerns should be provided by the applicant at this stage!

(B) Specific comments in regard to the internal layout of the site to aid social inclusion, the promotion of sustainable forms of transport, highway safety, reduce highway amenity issues and to reduce the impact on future highway maintenance that LCC Highways considered need to be addressed by the applicant.

LCC's Section 38 Engineer has reviewed the latest layout in detail and I provided comments below addressing in the first instance '**Planning Issues**' then secondly '**Issues relevant in regard to the potential for future Adoption of highway associated with this proposal**'.

(Please Note: the comments below do not represent repetition but are set out in this way to make clear to the applicant the differentiation between planning matters which may or may not be supported by the LPA and adoption issues which the applicant should understand if unresolved will remain irrespective of whether the application is approved.)

Planning Issues

The Highway Development Control Section recommends the following changes to the internal layout of the site to aid social inclusion, the promotion of sustainable forms of transport, highway safety, reduce highway amenity issues and to reduce the impact on future highway maintenance

1. At plot 73 I consider a 3.5m wide cycle lane should be provided between the site and Astland Gardens to aid sustainable forms of transport and support social inclusion, connection to/from the linear park for local residents and a more direct route to local amenities and the school.

This is not suitably addressed in the latest plan. The Masterplan shows a 3m wide facility which appears to narrow to around 2m at the western end.

The proposed ped/cycle connection is not acceptable as the route is over a shared space area that LCC would not wish to adopt.

There are no details regarding the connection to Astland Gardens and how delivery of this connection is achievable given the site red edge.

2. All off road paths should be 3.5 m wide cycle paths to aid sustainable forms of transport and support social inclusion.

The proposal appear to show 3.0m shared ped/cycle paths which is the minimum standard, however, at least 3.5m is recommended as best practice for a shared pedestrian/cycle facility. The layout is not constricted and therefore best practice should be provided.

3. A turning head is required to allow refuse vehicle and emergency vehicles to turn within the site for the following reasons: -

- The maximum distance a refuse vehicle should reverse is 12m, from Manual for streets and BS5930: 2005.
- Fire and rescue Services Section should not have to reverse more than 20m from the end of an access road. From Manual for streets and diagram 24 of Approved Document B (Fire Safety).
Additional considerations when locating the turning head are:-
- 25m is the maximum distance a two wheeled refuse container is to be transported to the refuse wagon. From Manual for streets and BS5930: 2005.
- A resident should not be required to carry the waste more than 30m to the refuse storage point. From Manual for streets and BS5930: 2005.
- A fire appliance needs to be able to approach to a point within 45m of a suitable entrance to any dwelling. From Manual for Streets and section 11.2 of Approved Document B (Fire Safety).

The turning head to be either a prescribed "Access Way" turning head from Lancashire County Council Residential Design Guide or the applicant to prove the turning head layout by swept path analysis for a twin axel refuse vehicle. The applicant should provide accurate details of the required turning head before determining the application and the turning head protected under condition, for perpetuity.

On the access road leading to plots 123-131 a turning head has been provided. This turning head should be proven by swept path (for a large twin axle refuse vehicle) as layout not to standard. (note: previous swept path analysis shown for a similar layout at this location was not acceptable).

All internal roads and turning heads should be proven by swept path analysis with a large twin axel refuse vehicle. A plan at an appropriate scale (1:500 at A0) should be provided for the latest layout.

Plots 123-131 - there are not adequate sight lines provided for parking spaces fronting the apartment block.

All access roads beyond the main site access road (east of the first internal junction) do not provide a variation in width to allow passing.

4. The West Lancashire Borough Council Local Plan Publication recommends the following individual parking provision: -
 - Two to three bedroom properties to have 200% parking.
 - Four to five bedroom properties to have 300% parking.
 - The minimum internal single garage size to be 6x3m and this includes integral garages.
5. The minimum internal dimension for all single garages to be 6x3m. Individual garages, of minimum dimensions of 6 x 3m, count as one parking space. The Highway Development Control Section is of the opinion that where garages are smaller than the recommended minimum internal dimension of 6 x 3m they should not be counted as a parking space and the applicant should provide an additional parking space for each garage affected.

Clause 8.3.41 on page 109 from Manual for Streets also recognises the many authorities now recommend a minimum garage size of 6 x 3m.

The recommended length of 6m is based on the length of a large family car (Ford Mondeo Estate 4.58m long), clearance between the car and the garage door, with room to open and close the garage door (600mm), room at the front of the car (800mm) for possible access to the dwelling and storage of cycles, bins gardening equipment etc.

The recommended width of 3m is based on the width of a large family car (Ford Mondeo Estate 2.09m wide), clearance at the passenger side to the garage (200mm), clearance at the drive side of the car and the garage (700mm), with room to open car door for less able bodied.

LCC will not count smaller garages in consideration of parking provision. At all locations where garages are not to minimum dimensions LCC highways recommend additional parking provision is provided as set out in comment 4 (parking provision above)

6. The internal road to be designed to ensure that the vehicle speeds are kept below 20mph with better use of horizontal deflection, rather than vertical deflection. Typically the speed reducing features to be at a maximum of 75m centres.

The above design approach has not been fully addressed, units 108 to 123 and 29 to 49 do not satisfy this. LCC will expect all internal sections of adopted highway to be self-enforcing 20mph

7. The Highway Development Control Section recommends the local planning authority attaches conditions requiring the applicant to provide details of the proposed arrangements for future management and maintenance of the proposed streets within the development. This information should include dates for the phasing of entering either a section 38 agreement of the Highways Act 1980 or the establishment of a private management and Maintenance Company.

LCC have indicated that there are numerous locations where streets and paths will not be adopted by LCC based on the current proposals. How will these areas be managed? How will areas be managed until acceptable sections are offered up for and subsequently adopted.

8. Where the carriageway is serving more than 30 properties the carriageway width to be a minimum width of 5.5m with a 2m wide footpath on both sides of the carriageway. Where the carriageway is serving less than 30 properties the carriageway width to vary in width between 4.5 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.5m wide. Where the cul-de-sac serves less than 20 properties the carriageway to vary in width between 4.1 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.1m wide. While diagram 7.1 from Manual for Streets illustrates what various carriageway widths can accommodate, they are not necessarily recommendations. The cul-de-sacs are also shared access roads where pedestrians are expected, including mobility impaired and children. Some of the cul-de-sacs also provide pedestrian and cycle connections to the public open spaces and as such pedestrian movements on these roads will be more than expected. Alternatively where less than 30 properties, provide a constant carriageway width of 4.5m with continuous 2m footpath for the full length of the cul-de-sac.

The criteria above has only been partly addressed within the latest proposals shown on the site layout Masterplan - but issues remain. For example, between units 29 – 49 there is no widening to allow passing. This could be expected to be exacerbated by a greater likelihood of on street parking where issues of garage sizes are not addressed. All other cul-de-sacs within the site reflect this lack of any widening to allow passing in places

Issues relevant in regard to the potential for future Adoption of highway associated with this proposal

The following comments are regarding the future highway adoption under a section 38 agreement with Lancashire County Council and the applicant is advised to consider these comments as part of this planning application, where they wish to offer the road for adoption. Where the recommendations below are not implemented the highways may not be suitable for adoption. Further guidelines regarding highway adoptable layout can be found on the Lancashire County Council Residential Road Design Guide and the construction of the highway to be to the Lancashire County Council Specification for Estate Roads 2011 edition:-

1. A turning head is required to allow refuse vehicle and emergency vehicles to turn within the site for the following reasons: -
 - The maximum distance a refuse vehicle should reverse is 12m, from Manual for streets and BS5930: 2005.
 - Fire and rescue Services Section should not have to reverse more than 20m from the end of an access road. From Manual for streets and diagram 24 of Approved Document B (Fire Safety).
Additional considerations when locating the turning head are:-
 - 25m is the maximum distance a two wheeled refuse container is to be transported to the refuse wagon. From Manual for streets and BS5930: 2005.
 - A resident should not be required to carry the waste more than 30m to the refuse storage point. From Manual for streets and BS5930: 2005.
 - A fire appliance needs to be able to approach to a point within 45m of a suitable entrance to any dwelling. From Manual for Streets and section 11.2 of Approved Document B (Fire Safety).

The turning head to be either a prescribed "Access Way" turning head from Lancashire County Council Residential Design Guide or the applicant to prove the turning head layout by swept path analysis for a twin axel refuse vehicle. The applicant should provide accurate details of the required turning head before determining the application and the turning head protected under condition, for perpetuity.

On the access road leading to plots 123-131 a turning head has been provided. This turning head should be proven by swept path (for a large twin axle refuse vehicle) as layout not to standard

2. The internal road to be designed to ensure that the vehicle speeds are kept below 20mph with better use of horizontal deflection, rather than vertical deflection. Typically the speed reducing features to be at a maximum of 75m centres.

3. Where the carriageway is serving more than 30 properties the carriageway width to be a minimum width of 5.5m with a 2m wide footpath on both sides of the carriageway. Where the carriageway is serving less than 30 properties the carriageway width to vary in width between 4.5 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.5m wide. Where the cul-de-sac serves less than 20 properties the carriageway to vary in width between 4.1 and 6m to allow passing and additional occasional parking a minor percentage of the road width to be 4.1m wide. While diagram 7.1 from Manual for Streets illustrates what various carriageway widths can accommodate. They are not necessarily recommendations. The cul-de-sac are also shared access roads where pedestrians are expected including mobility impaired and children. Some of the cul-de-sac also provide pedestrian and cycle connections to the public open spaces and as such pedestrian movements on these roads will be more than expected. Alternatively where less than 30 properties provide a constant carriageway width of 4.5m with continuous 2m footpath for the full length of the cul-de-sac.

Conditions

If the LPA are minded to approve this application I would suggest the following conditions:

1. Notwithstanding the provisions of the Town and Country Planning (General Development Procedure) Order 1995 and the Town and Country Planning (General Permitted Development) (Amendment) (No 2) (England) Order 2008, or any subsequent Orders or statutory provision re-enacting the provisions of these Orders, all garages shown on the approved plan shall be maintained as such and shall not be converted to or used for living accommodation without the prior written approval of the Local Planning Authority in consultation with the Highway Authority.
2. Prior to the start of the development, a joint survey shall be carried out between the developer and the planning authority (in conjunction with the highway authority) to determine the condition of Station Road A similar survey shall be carried out every six months and the final inspection within one months of the completion of the last house, and the developer shall make good any damage to Station Road to return it to the pre-construction situation as required. Reason; To maintain the construction of Station Road in the interest of highway safety.
3. No development shall be commenced until an Estate Street Phasing and Completion Plan has been submitted to and approved in writing by the Local Planning Authority. The Estate Street Phasing and Completion Plan shall set out the development phases and the standards that estate streets serving each phase of the development will be completed. The Estate Street Phasing and Completion Plan shall set out dates for entering of the section 38 agreement of the Highways Act 1980 or the establishment of a private management and Maintenance Company. Reason: -To ensure that the estate streets serving the development are completed and thereafter maintained to an acceptable standard in the interest of residential financial security and highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the development; and to safeguard the visual amenities of the locality and users of the highway.

4. No development shall be commenced until the estate street fronting the property has been completed in accordance with the Estate Street Development Plan. Reasons: - To ensure that the estate streets serving the development are completed and maintained to the approved standard, and are available for use by the occupants, and other users of the development, in the interest of highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the approved development; and to safeguard the visual amenities of the locality and users of the highway, in accordance with Policies within the Development Plan.
5. No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under section 38 of the Highways Act 1980 or a private management and Maintenance Company has been established.
6. No development shall be commenced until full engineering, drainage, street lighting and constructional details of the streets proposed for adoption have been submitted to and approved in writing by the Local Planning Authority. The development shall, thereafter, be constructed in accordance with the approved details, unless otherwise agreed in writing with the Local Planning Authority. Reason: In the interest of highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the approved development; and to safeguard the visual amenities of the locality and users of the highway in accordance with Policies within the Development Plan.

I hope the above is of assistance.

Yours Faithfully



David Watson
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