

APPENDIX E

Summary of Consultee Responses to Draft Masterplan

Lead Local Flood Authority - The ROC Pickerings Farm, Penwortham Flood Risk Drainage Note dated 13th November 2018 notes 'Some limited flooding is identified to the south west of the site between Chain House Road and A582 embankment. This is considered to be caused by water backing up behind the highway embankment with conveyance limited by the existing culvert beneath the A582.' A development of this size will result in a significant increase in the surface water discharge. Therefore, it is essential that any undersized culverts under the A582 are replaced with appropriated designed culverts in phase 1 of the development.

The ROC Drainage Note also notes 'Significant flooding is shown to the north west from the tributary drain along the northern boundary. This length of watercourse is primarily in culvert and is shown on United Utilities drainage records as private drain. It serves both the development site itself and the adjacent residential areas outside the northern boundary. Flooding here is caused by water backing up behind the culvert and ponding in the low-lying topography. Modelled flood depths are typically less than 0.5m but extend over a large area.' As residential development has been allocated for this area any surface water drainage proposals must address this flooding and ensure that any drainage from outside the development is fully accounted for.

The National Planning Policy Framework July 2018 (NPPF) states that major developments should incorporate sustainable drainage systems (SuDS) unless there is clear evidence that this would be inappropriate. Therefore, the retention of SuDS features such as open watercourses, ponds, basins and swales is highly appropriate and they could also enhance biodiversity and geodiversity.

The NPPF also states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. When local planning authorities are determining planning applications they should ensure that flood risk is not increased elsewhere.

It is important that surface water run-off is managed in a controlled way and the development should take account of the site's hydrological characteristics – soil type, topography, existing drainage behaviour such as flow paths.

Climate change and urban creep should be considered when calculating drainage requirements.

On large development sites such as this the use of hybrid surface water drainage solutions i.e. a mix of infiltration and open watercourse or sewer should be considered. If infiltration is possible it will help to reduce surface water run-off volumes.

Flood alleviation measures should be considered at the earliest possible time so that the community and other interested parties can comment on options or suggestions.

The Lead Local Flood Authority would prefer all infrastructure i.e. spine roads and drainage to be first phase. If a hybrid planning application is proposed (i.e. part full and part outline across the site) the infrastructure /drainage should be applied for in the full application.

Attenuation storage should also be part of a first phase application and if there are numerous features the volumes per feature should match the overall storage required.

Phasing and overall site drainage calculations – each parcel should have its own maximum discharge rate and this should be conditioned early in the process based on the overall rate available.

Land Drainage Consents should be considered in parallel with the planning process so as not to cause issues later (supported by NPPF paragraph 42 July 2018). The developer should consider the Lancashire County Council policy of not encouraging the culverting of ordinary watercourses. This is not just a maintenance issue and relates to habitat and ecology etc.

LCC Education - Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. The Strategy for the provision of school places and school's capital investment 17/18 to 19/20 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement.'

The Council produces an Education Contribution Methodology document which outlines its methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers. The School Planning Team acknowledges the receipt of the latest draft version of the Pickering's Farm Master Plan 9th November 2018. The latest version follows on from the draft version 28th September 2018. This has included a number of steering group meetings attended by LCC infrastructure providers, this includes dates of 21st August and 10th September 2018.

Following the meeting in September the draft master plan was received which included reference to a new single form entry primary school. However, further information within the September version referred to a 2 form entry primary school. The early stage of the City Deal planning advised the need for 2 forms of entry at primary school level. It is appreciated that this has now been rectified by Taylor Wimpey and Homes England in the latest draft version to reflect the need for 2 forms of entry. Reference to the changes can be seen in the Executive Summary Page 4, 8.0 Physical & Social Infrastructure Requirements page 44 and 9.0 Development Parameters page 48. Safeguarded land S2 within master plan indicates land for an additional 650 dwellings above the 1350 indicated for Site EE. Therefore, the proposed 2000 dwellings further highlights the need for 2 forms of entry primary school.

It is understood that safeguarded sites S3/S4 will not form part of the current master plan process at this consultation stage. The School Planning Team will require additional information before we are able to assess the likely impact on education, if South Ribble are to consider these safeguarded sites as part of this masterplan or subsequently.

At this point in the planning process, the Pickering's Farm strategic site bedroom mix and phasing is not known. Therefore, a worst case 4 bedroom scenario is applied, as detailed in the Education Contribution Methodology document. The School Planning Team reserve the right to recalculate the pupil yield when further information is received through the planning application process.

In principle and at this early stage The School Planning Team have no objections to the position of the school, indicated by the proposed site plans. LCC would like it noted that the earliest opportunity to conduct a full feasibility of the proposed site would be appreciated. This will ensure

suitability and access issues can be resolved to ensure delivery of pupil places meet the needs of the development.

LCC Public Rights of Way - Guidance contained in paragraph 98 of the National Planning Policy Framework, requires authorities, when making planning decisions to consider whether the development should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

It is considered that to protect and enhance the existing public rights of way that are not to be diverted to enable the development, includes avoiding the creation of a corridor path (fence/hedge/walls on both sides) that could have an adverse effect on the users enjoyment of the way and increase the potential for issues relating to anti-social behaviour.

Furthermore, proposals to change the surface, or height of the existing public rights of way should be highlighted at an early stage in the consultation process to ensure the existing public rights of way will be suitable for the expected increase of use and to ensure that unreasonable gradients, or steps are avoided.

Stiles and gates can inhibit, or at the least, make a route difficult for use by those that have a difficulty with mobility, or pushchairs. Therefore, even if there is currently a stile or gate in place, it's purpose should be considered and unless it is needed to prevent the ingress or egress of livestock, the removal of the structure should be considered to provide access for all.

When the details are available we would be grateful for the opportunity to comment on the alignment, width, materials and construction specification for the proposed alternative routes. We will require a plan that identifies the public rights of way that will be affected by the development and the proposed alternative routes. In considering potential revisions to an existing right of way that are necessary to accommodate the planned development, but which are acceptable to the public, any alternative alignment should avoid the use of estate roads for the purpose wherever possible and preference should be given to the use of made up estate paths through landscaped or open space areas away from vehicular traffic.

When a diversion is needed to enable development, Section 257 of the Town and Country Planning Act 1990 (TCPA90 S257) is the appropriate legislation to use to divert a public right of way and this is a procedure that is administered by the local planning authority. The grant of planning permission does not entitle developers to obstruct a public right of way. It cannot be assumed that because planning permission has been granted that an order under section 247 or 257 of the 1990 Act, for the diversion or extinguishment of the right of way, will invariably be made or confirmed. Development, in so far as it affects a right of way, should not be started and the right of way should be kept open for public use, unless or until the necessary order has come into effect. It is a separate process to the planning permission but can be processed at the same time as the planning application is considered.

The appropriate legislation for a temporary closure is Section 14(1) of the Road Traffic Regulation Act 1984 any work relating to the development that will impact on a Public Right of Way will require a temporary closure. If a temporary closure is required the Order should be in place prior to commencement of construction works as it is a separate legal process to planning permission.

The only mention of specific cycling provision within the masterplan is a shared use facility alongside the main access road. While this is to be welcomed the masterplan is covering a large development site along a main transport link and there is an opportunity to create segregated cycle & pedestrian use

The masterplan states that the other access roads will have 2.0m wide footways with cyclists using the carriageways - I suggest that these should be widened to 3.0m shared use facilities wherever

possible, to encourage as people to start cycling off the carriageway in what will be perceived a safer environment than using the roads

There is a lot of mention of the 'green lanes' where pedestrian and cycle use will be prioritised it is not clear how this would work and again I would suggest that there needs to be separate pedestrian/cycle provision where possible away from any vehicles. It says the design of these lanes would be subject to further discussions so moving forward I think we would want an input to these?

The site seems to occupy a gap in cycling provision in a roughly north-south and east-west direction and the masterplan is a good opportunity to plug some of these gaps and create, longer continuous routes through and beyond the site (in the interests of sustainable transport).

One of the key routes to improve is cycling and walking access along Bee Lane and across Leyland Road. Providing a cycle route along here and then eastwards will give people who live on the site direct access to Preston City Centre via the existing Tram Road and Preston junction routes (Route 55)

There are a number of Public Rights of Way that need to be diverted, improved or status upgraded as part of the development. The majority of the path that need improvements are within the perimeter of the site and therefore will be the responsibility of the developer. Those mentioned that fall outside the development will be subject to a S106 Agreement.
To be retained; 7-9-FP52; 7-9-FP53; 7-9-FP46; 7-9-FP50

Diversions, Upgrades & S106 requests:

- 7-9-FP49 Current line of the path is along the side of the brook. The path should be diverted to the eastern side of the brook, removing the need for a bridge crossing and upgraded to a 4metre wide Bridleway for shared use.
- 7-9-FP42 - Part of which will be an estate road into the development.
- 7-9-FP's 42 & 43 should be upgraded to Bridleway status to reach the Leyland Loop.
- 7-9-FP46 & FP 44 – S106 for offsite improvements to improve links to schools
- 7-9-FP54 & FP25 - should be upgraded to Bridleway status to reach Leyland Loop/proposed cycle path along Penwortham Way
- 7-9-FP55, FP56 & FP57 – should be retained as a green corridor and upgraded to bridleway status linking to the Leyland Loop/proposed cycle path along Penwortham Way
- 7-9-FP 52 – Resurface to Bee Lane, widen to 2 metre and tree damage to surface so some tree removal needed (S106 - £40k).
- Central Greenspace including Preston Junction and links to Avenham Park, Guild Wheel and Preston City Centre, Preston Station including access to University of Lancashire and links to BAE systems – Use of this network will be greatly increased by development including site revenue costs of dog bins etc. Surfacing network improvements £750,000. Approximately 5km of network improvements and connecting links needed.

LCC Highways - comment that the principles set out within the draft Masterplan proposals seek to demonstrate how this large residential-led development can be brought forward in a sustainable manner. The Masterplan also demonstrates how the requirements of the local plan can be met with regard to the Cross Borough Link Road (CBLR) and provision of this east/west route to provide local access to support development, subject to detailed design and funding/delivery of infrastructure outside the control of the developer.

The following matters are deemed, in general, acceptable to LCC Highways:

- The comprehensive layout of the main access and associated access roads (subject to detail design to appropriate standards;
- Indicative primary and further secondary access points;

- Longer term proposals to deliver infrastructure to support Public Transport routing into and through the site;
- Use of quiet lanes for sustainable modes (where appropriate and subject to evidence);
- Location of proposals for the school, Local Centre and other commercial land use elements;
- The principle to deliver a detailed Phasing and Infrastructure delivery for vehicular traffic including CBLR subject to evidence that satisfies needs of all users and the wider integration at all stages/plans;
- Development proposals to be supported by a detailed TA and site Travel Plan

However, there are a number of areas of the draft masterplan that require further consideration, and LCC Highways set these out in the consultation response and provide details of the requirements for each. These areas relate to sustainability of the site; highway safety; pedestrian safety; the impacts on the Leyland Road/Bee Lane roundabout and associated railway bridge crossing over the West Coast Main Line; how to control the number of vehicles using the access; the impact/usage of the existing lanes (to be 'quiet lanes') in relation to the lack of footpaths, lighting, existing traffic, routing; impact on equestrian use

In summary, LCC Highways are **not satisfied** that the proposals set out in the Masterplan demonstrate sustainability.

Access Strategy - The draft masterplan for the site indicates vehicular access will be taken from a number of new vehicular access points which have yet to be finalised but are likely to consist of consideration for access points at the following locations:

- A582 Penwortham Way
- Bee Lane onto Leyland Road
- Flag Lane onto Leyland Road
- Coote Lane;
- A proposed vehicular link to the northwest of the site towards Kingsfold

The main vehicular access has been discussed and agreed in principle with LCC as local highway authority. The main access is likely to require a signalised T-junction. This will be subject to assessment as part of the submitted TA.

Street Hierarchy - Primary internal spine road is proposed as a 7.3m wide carriageway with 2m footway on one side and a shared 3.0 wide pedestrian/cycleway on the other side. The pedestrian/cycle provision which is now promoted is for a minimum of 3.5m. This shared pedestrian/cycleway will link into the similar provision to be delivered as part of the A582 dualling proposals.

The draft Masterplan states that '*secondary access to the site has been agreed and that this will be via a connection to Bee Lane.*' LCC Highways have been very clear that the current standard of Bee Lane and its access with Leyland Road will only support a limited level of new trips. The impact of increased vehicular movements on sustainable movements need to be evaluated and will require appropriate mitigation measures from first occupation of the site to ensure safe access routes to the primary public transport corridor on Leyland Road and wider local amenities.

Internal access - The draft Masterplan states that Bee Lane, Flag Lane, Nib Lane, Moss Lane and Lords lane will be retained, allowing for continued vehicular access to existing properties. LCC Highways would note there is a need to ensure all existing rights of access are maintained or an acceptable/appropriate alternative provided – this includes safe access for sustainable modes. The developer should review all affected properties to ensure there are no existing covenants that could restrict potential to implement future proposals/access changes.

The Masterplan states '*The developers have also held a series of one to one sessions with residents of the site to establish the most effective way of integrating their properties into the development.*'

I would note LCC Highways comments provided above in respect of a need to ensure the site can deliver sustainable and suitable access and how this will require a review of how the quiet lanes within the site are currently used (numbers, classification and times of day). This is important as an alternative access to the adopted highway network will become available via A582 Penwortham Way and LCC consider current property owners on the site should be given as much information as possible regarding what will be required to bring the site forward in a sustainable manner.

In regard to access to Holme Farm Dairy, I note the Masterplan states *'through consultation a direct link from Holme Farm Dairy to the new road access'*.

- While this is not unreasonable, I would highlight that the access will need to be constructed to appropriate commercial vehicle standards. This will also influence the standard of the initial section of the main access road, where LCC highways would expect to see only a limited level of side access and frontage access.

- The opportunities created to review, and where appropriate downgrade, existing lanes through the provision of any new access points should be fully explored.

Public Rights of Way (PROW) - There is an extensive network of Public Rights of Way that run through or adjacent to the proposed site and improvement of these existing facilities as well as provision of new links could be expected to deliver sustainable development.

LCC Highways would expect to see full assessment of any proposals that impact existing PROW and associated mitigation measures as part of any submitted planning applications on the site.

Access to Public Transport and Future Public Transport Routing - In the early phases of development prior to any penetration of public transport into the site there will be substantial walk distances to access PT services. These services will be accessed on the primary PT corridor on Leyland Road. Walk distances of between 1200m and 1400 to the nearest PT stops on Leyland Road will be typical for the residents of the dwellings delivered in Phase 1 of the proposed Masterplan. These distances **would not be considered acceptable** in most circumstances. Where the provision for pedestrians is considered poor the distance creates and even greater barrier to achieving sustainable development. This issue requires further thought.

The masterplan indicates future penetration by public transport into the site with access from Bee Lane and/or access to Kingsfold. The main site access via A582 Penwortham Way is unlikely to be an attractive PT route to operators. Any new services or service extensions/diversion will need to be funded by development and should be delivered as early as possible in the site build out to promote PT use and site sustainability.

The potential impacts of on-street parking, as a result of the proposed school and local centre, on PT routing should be considered in the development of the Masterplan. As a minimum, adequate parking provision will be required to ensure PT service reliability can be maintained.

Sustainable Urban Drainage Systems (SuDs) - Clearly, the development of the Pickering's Farm site application should consider the requirements likely to be asked for in support of a SuDs drainage scheme. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance. LCC will seek to limit the use of culverts where alternative sustainable solutions can be found. (See Lead Local Flood Authority (LLFA) response, above)

Phasing and Infrastructure Delivery - The illustrative Masterplan and Indicative Phasing Plan layout including: Primary road network; Secondary Road network; Existing Lanes; and Public Rights of Way

Figure 11.1 with the draft Masterplan shows the land controlled by Taylor Wimpey (TW) and Homes England (HE) 'the Developers' and also that which is under the control of third party ownership.

Highways and Transport Phasing and Implementation - Elements of the infrastructure improvements that would be required from first occupation are included in areas shown to only come forward in later phases and potentially requiring land not in the control of 'the developers' (TW & HE). The draft Masterplan and indicative phasing plan indicates a 4 phase approach, it indicates:

- Road hierarchy without addressing how and when existing lanes such as Bee Lane and Flag Lane will be improved to support the necessary changes (vehicular and sustainable movements)
- Housing build-out locations by phase
- Local centre location
- School site location

The proposals to date do not indicate in any detail the infrastructure works required to support each of these stages. The draft Masterplan states that 'a detailed Phasing and Infrastructure delivery Schedule will be agreed with SRBC at the planning application stage'. This is only acceptable once the key issues are addressed by the Masterplan. As presented the draft Masterplan **does not** address key issues particularly for sustainable access and certainty of delivery to ensure all infrastructure, at all stages of each phase is viable. The approach should indicate all infrastructure identifiable as necessary at the time required to support each element, this should be listed and include:

- Changes to existing lanes
- Sustainable link improvements on Bee Lane and Flag Lane corridors
- Traffic calming / TRO's / other highway improvements to Bee Lane & Flag lane
- PT enhancements
- Improvements to PROW
- Expected off site highway works -Bee Lane / Leyland Lane; Studholme Avenue; Brownedge Road / Tardy Gate

Any other corridors/locations - The draft masterplan does consider other committed and emerging development including a number of potential further network/infrastructure changes that must also be taken into consideration. The key factors that require close consideration and an agreed approach are:

- (a) Completion of Penwortham Bypass
- (b) A582 Dualling;
- (c) Cross Borough Link Road (CBLR) – delivered by Pickering's Farm development
- (d) Improvements to the local Network Tardy Gate, other corridors in Lostock Hall Brownedge Road and Carwood Road
- (e) Public Transport Corridor Improvements

To undertake appropriate assessment it will be necessary to understand the proposed phasing of the development 'build out' with consideration for the timing of necessary infrastructure improvements (demonstrating the certainty of delivery of each).

LCC Highways consider that a clear access strategy must be set out as part of the necessary Masterplan for the strategic site. The Masterplan should set out clearly how these access points will be managed and what improvements/changes are expected to be necessary to support the strategy. It is LCC Highways view that piecemeal development in advance of any Masterplan (or development that comes forward following a Masterplan that has failed to establish how key matters can be delivered) could potentially prejudice the delivery of:

- the wider strategic site;
- an acceptable access strategy that also delivers suitable sustainable transport connections, including public transport routing options; and
- appropriate provision in regard to the completion of the Cross Borough Link Road (CBLR) and the wider implications beyond, such as the appropriate assessment of the influence of redistribution, changes in flows at the Leyland Road intersection and at Hennel Lane roundabout and corridors beyond.

The access proposals clearly need to have regard to both the short and longer term scenarios that will need to be considered. These include the proposed dualling of the A582 Penwortham Way and completion of the CBLR (which will link the A582 with B5254 Leyland Road and could include a new bridge crossing the West Coast Mainline railway or improvements to the existing bridge and junction of Bee Lane/Leyland Road).

The Transport Assessment that is being produced will assess the impact and level of development that ultimately can be delivered. This must relate directly to delivery of infrastructure and when this will be necessary to mitigate the assessed impacts. The masterplan should set out the overall infrastructure that is expected to be necessary to support the site and then the individual elements expected to be required to support delivery of individual development parcels or phases. The Masterplan should detail the mechanisms that will ensure all necessary infrastructure can be brought forward. This is seldom satisfactorily achieved through piecemeal development (where early phases of development on the site do not contribute sufficiently to the necessary wider infrastructure requirements) resulting in a shortfall and viability issues for development coming forward in the later stages.

In Summary - The comments provided by LCC Highways consider the draft Masterplan and present highways and transportation matters identified as potentially significant issues that should be considered and addressed within the final Masterplan for the site. The final Masterplan should then inform the subject matter of the EIA and any subsequent planning applications. All the above will influence the delivery, scale and viability of development that can be brought forward on this important site. As correctly set out in the SRBC Local Plan, comprehensive development of the site is crucial to ensure delivery of essential infrastructure and local services. If the above matters are suitably addressed within the final Masterplan this will allow a clear understanding of how the site could come forward. From a highways and transportation perspective this will mean that an appropriate Transport Assessment can be developed to establish the full impacts of the overall proposals and therefore the measures and mitigation necessary to deliver sustainable development in line with the latest local and national planning policy (NPPF). In addition, the Masterplan will inform appropriate assumptions on phasing and delivery that will support analysis of the short, medium and long term scenarios that will be required within the Transport Assessment to establish impacts and necessary infrastructure and measures as each phase is brought forward.

Environmental Health - consider that there needs to be a re think on the overall layout of the site. The initial suggestion had a link road running across the site from the roundabout with the Cawsey to Penwortham Way. The proposed masterplan does not have this link and as such traffic congestion within Lostock Hall, a declared AQMA, will not be improved. The link through the site to the East (the Cawsey) will exacerbate the problem. While the site itself has a link to Penwortham Way this will not assist rush hour traffic travelling to the local schools or to the nearby shopping area in Lostock and with the preferred route to the motorway network being through Lostock. Given the high numbers of additional trips to be generated by the development some consideration of off-site mitigation measures for the negative air quality impact will be required e.g. cycle routes along Leyland Road, additional bus infrastructure and a car sharing scheme are just some of the options available.

The road link to the north into Bramble Court is also likely to generate some resentment by the existing properties.

The master shows a torturous route through the housing estate, potential placing people at greater risk from poor air quality and noise if the site is used as a link from east to west as originally planned and from a greater risk of traffic related accidents.

The community centre appears very close to the nearby housing and elderly care apartments and potential disturbance from this site would need to be carefully considered. A more appropriate location may be adjacent to the primary school and commercial units to the northwest or on the larger green space to the southeast, away from the housing.

In general as this is an allocated site then development will go ahead at some point, although density does need to be considered. There will be various conditions recommended once the application has been submitted particularly over the construction phase of the development. I would urge the planning department to request such reports as air quality assessment to be undertaken for the site as a whole to ensure that the impacts are not negated by splitting the site into smaller parcels as happened at Croston Road in Leyland. In conclusion the masterplan needs a rethink.

United Utilities - comment that the developers need will be aware that growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to delivery. There are parts of the land within the allocation that are close to existing infrastructure assets, but these may be on the fringe of the existing water supply and sewerage infrastructure networks that are of a size that reflect the greenfield location. The current assets may have limited capacity to support the planned growth. Providing a co-ordinated approach to infrastructure by collaborating with United Utilities will result in providing assets required to support the planned growth. Therefore UU recommend that the developers **contact us as early as possible to discuss their options** as part of the phasing and infrastructure delivery schedule. It is important that the delivery of any new United Utilities infrastructure is considered as part of any supporting highway infrastructure/scheme as part of a co-ordinated approach.

UU then comment on the challenges the allocation faces and the need for a comprehensive approach to guide the delivery. Their concern is that infrastructure requirements can be diluted as a consequence of fragmented land ownership and the achievement of sustainable development can be compromised by developers/applicants working independently. It is integral that the proposed phasing and infrastructure schedule ensures each development phase has unfettered access to available infrastructure and is not prevented by third party land issues. It is important that a following phase of development can proceed as the previous developer has been obliged to meet specific requirements contained in the schedule, including infrastructure, as part of such a strategy.

In respect of the Green Infrastructure Network and Surface Water Management, throughout the masterplan there is an expectation for the Pickerings Farm development to provide significant amount of Green Infrastructure. United Utilities appreciates the allocation of land for above ground retention ponds and the reference made to use the green infrastructure network. United Utilities feel that there is opportunity as part of the Masterplan to further expectations to ensure all new to development coming forward must to follow the hierarchy of drainage options for surface water to reach a specific watercourse/attenuated pond on site. **It is important the surface water hierarchy is referenced directly in the Masterplan to become a material consideration for new development as it comes forward.**

United Utilities recommends that consideration is given when producing a sustainable drainage strategy to identifying the preferred body into which surface water will discharge from each development phase.

UU are happy to note that the draft layout has allocated land to genuine, above ground SuDS features. It is also important to note the significant role that design when it comes to maximising such features. We are pleased such considerations are included, but we would look for the document to specify opportunities to ensure maximum contribution from design and topography to reducing surface water run-off. We would wish for the Masterplan to state there is a requirement for new development to be innovative when considering drainage design, ensuring there is unfettered access to the SuDS features available so surface water can naturally drain the most preferable option.

In addition, we suggest the following text to be added to the document, which can be amended to reflect any local circumstances/preferences: *'The development of the site will be expected to follow the surface water hierarchy and incorporate exemplary Sustainable Drainage methods. The expectation will be for only foul flows to communicate with the public sewer. The preference will be*

for new development to incorporate surface level sustainable drainage systems with multi-functional benefits as opposed to underground tanked storage systems for the management of surface water. Any proposal as part of the Pickerings Farm allocation will be expected to be part of a site wide strategy for infrastructure (foul and surface water and clean water supply) that considers topography to avoid a piecemeal approach to infrastructure. Proposals should demonstrate how the site delivers infrastructure as part of a wider strategy having regard to interconnecting phases of development. It will be necessary to ensure the infrastructure proposals are part of a wider, holistic strategy which coordinates the approach to infrastructure between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to infrastructure on a phase of development has regard to interconnecting phases within a larger site. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development. This will ensure a piecemeal approach to infrastructure is avoided and that any early phases of development provide the infrastructure to meet the needs of any later interconnecting phases of development. In delivering drainage as part of a wider strategy, applicants will be expected to ensure unfettered rights of discharge to watercourses between the various parcels of development within a wider development to prevent the formation of 'ransom situations' between separate phases of development. Approved drainage schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes.'

Water efficiency measures - United Utilities would encourage the use of systems like grey water recycling that help to reduce pressure on public water supply and the public sewerage system. We feel that there is an opportunity as part of the Masterplanning process to add a requirement for all new development to encourage water efficiency measures/techniques as part of the design process. This should be strongly considered as a requirement for employment uses in the allocation, due to the ease of implementing such measures for such uses.

In respect of applying such measures to new development, we recommend this policy is added to the Masterplan: *'Where identified as necessary in consultation with infrastructure providers, applicants will be required to provide evidence and details of mitigating measures to support their proposals considering the impact on public water supply resources and utility infrastructure.'*

Summary - Moving forward, we respectfully request that South Ribble and associated developer continue to consult with United Utilities regarding the Pickerings Farm allocation. We are keen to continue to ensure that all new growth can be delivered sustainably and are happy to arrange a meeting to further discuss the content of this representation in more detail.

National Grid Asset Protection - have no objections to the proposal which is in close proximity to a High Voltage Transmission Overhead Line and enclosed a location map to show the location of National Grid's Overhead Lines within the vicinity of the proposals and associated information.

Network Rail comment that it is proposed to use existing highways over the railway to access the site for development. Should there be any requirement to widen / alter any bridges over the railway then **early consultation should take place with both Network Rail's Engineering and Property teams**. Likewise, should there be a requirement for any other property interests or rights then early consultation should also take place. **They advise consultation prior to the submission of any planning applications.**

Network Rail then describe their bridge assets at Flag Lane and Bee Lane and, light of the scale of the proposal, they would have **significant reservations** about the use of these assets as part of the proposal. Without knowing the proposals in full they cannot formally comment on the validity of the bridges to accommodate the additional loading, however, based on the assumptions made in the submitted documentation, such an increase in volume of traffic would have an **adverse effect on the assets**. At this stage Network Rail believes that significant strengthening or replacement of each asset to accommodate the proposals would be required.

They then set out that the development would be required to produce a study evaluating the estimated impact of the increased traffic on the existing bridge structures over the railway. The

report to identify appropriate mitigation measures to be put in place and the source of funding for the works required. Network Rail's prior approval to be secured to the report which should be a material requirement for the validation of any planning application that proposes using the bridges for the accessing any new development. Early consultation should take place with both Network Rail's Engineering and Property teams in the preparation of the report.

Network Rail also comment that the proposal is adjacent to the West Coast Main Line. The developer would be required to include within the detailed proposals asset protection measures to ensure that the development does not impact the safe operation and integrity of the railway.

They set out the requirements when designing proposals, and what will need to be included and actioned. Measures include a Risk Assessment and Method Statement (RAMS) for all works to be undertaken within 10m of the operational railway; details of a 1.8m trespass proof fence along the development side of the existing boundary fence to the West Coast Main Line; lighting and a method statement for any vibro-compaction machinery / piling machinery or piling and ground treatment works which may be undertaken

The also comment that any drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. For example they note that an attenuation pond is proposed directly adjacent to the WCML. The location of the pond would increase the risk of flooding, soil slippage and pollution, drainage issues onto the WCML and this should be removed from this location.

Network Rail also raise the issue of existing noise and vibration from the operational railway and the potential for future noise and vibration complaints and list a number of points for particular note.

Finally, they require assessments be carried out in relation to the impacts on the type and volume of user at level crossings in the area.

Wildlife Trust - consider the content of the Masterplan is acceptable as far as it goes but, in order to comply with NPPF and Local Plan policy, the Masterplan lacks the following important information:

- A detailed arboricultural survey identifying the healthy trees that need to be retained: the masterplan makes reference to these trees and a protection zone around them but doesn't actually include the information.
- A more detailed plan showing the existing hedges and ditches that the plan is seeking to retain.
- Details of any extant ecological network within, across and through the site and connecting beyond, with a statement requiring the future applications to include a statement as to how the open spaces and corridors within the site will connect or otherwise relate to the wider ecological network and how any ecological networks will be maintained, enhanced, connected, reconnected and/or restored; and whether any new connections will be created..
- A requirement that, as planning applications are submitted for each phase, these must be accompanied by an ecological statement identifying areas of Habitats of Principal Importance in England and/or populations of Species of Principal Importance in England *and* the connecting landscape features (e.g. trees, hedges, ditches, ponds, agriculturally unimproved grassland etc.) that currently exist and which of those will be retained (with a justification for why some – if any - are proposed to be removed). This should also include information as to how these will relate to the layout of future phases & the overall masterplan.
- A requirement that each planning application must be accompanied by a construction method statement to include the means by which existing areas of Habitats of Principal Importance in England and/or populations of Species of Principal Importance in England (s41 Natural Environment & Rural Communities Act 2006); trees, hedges, ditches, ponds, areas of agriculturally unimproved grassland *etc.* will be protected during construction. As much as possible of the principal requirements for such a statement should be included as part of the masterplan, including a reference to complying with the appropriate British Standard: **BS 42020:2013 Biodiversity. Code of practice for planning and development.**

- Details as to how the open spaces within the site (those that are not intended to form part of private gardens) will be managed and maintained, including the requirement for such arrangements to be included in a legal agreement(s).
- An accounting for net gain in Habitats & Species of Principal Importance that would be delivered and sustained by the proposed development

There needs to be a clear objective in terms of how enhanced biodiversity will be achieved. There is no indication at this stage as to what sort of habitat will be created in all these spaces / corridors and, therefore, how biodiverse they will be and how conducive to the movement of wildlife. The Masterplan should essentially be a brief to developers as to the key measures that will need to be included in order to be able to demonstrate that the plan's objectives will be met and sustained.

The Police Architectural Liaison Officer - comments that security issues must be addressed as early as possible in the design phase of a Masterplan to enable crime prevention strategies to be effectively integrated into the development to keep people safe and feeling safe.

Given the large scale of the scheme, it is likely that the project will create increased demand on local policing resources with calls for service. As a result, the ALO requests that all elements of this development are built to the police preferred security specification Secured by Design.

The ALO set out the General Security Measures required in respect of public open space and play areas; cycleways/footpaths; the even coverage of street lighting to enhance surveillance; landscaping; boundary treatments

The ALO also sets out the Physical Security Requirements for both the residential dwellings and any commercial building which will need to be incorporated into the design of the dwellings at planning application stage

Finally, the ALO comments that there have been reported thefts and burglaries at construction sites across Lancashire. High value plant machinery, hand and power tools, lead and metal piping, insulation materials and boilers have all been targeted, with some stolen items used to commit further criminal offences. This is placing additional demand on local policing resources. Therefore they provide advice on security measures to be included throughout the construction phase

Cadent Gas - has identified the following apparatus within the vicinity of the proposed works: Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment

- Low pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated)

Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and **discussions should be started at the earliest opportunity**. Please be aware that diversions for high or intermediate pressure apparatus can take in excess of two years to plan and procure materials.

Cadent also set out a number of key considerations for the developers to be aware of such as a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent/temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Cadent then set out their General Notes on Pipeline Safety and provided some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets such as piling and boring and tree planting schemes

They provide advice on pipeline crossings, for example where existing roads cannot be used, construction traffic should only cross the pipeline at agreed locations.

Farington Parish Council - Consider that the access road to the site is not acceptable and this development will introduce a further extra 4000 vehicles onto an already congested road network, ie Leyland Road and Penwortham Way. The Parish Council does not feel that Coote Lane is a suitable access point for major development. Also the Parish Council is concerned about the lack of public transport. In addition to this the extra vehicles will result in a detrimental effect to the already poor air quality in Tardy Gate at Lostock Hall, Walton le Dale and Penwortham which already suffer with poor air quality and are designated as AQMAs.

There is also a lack of infrastructure included in the Masterplan. Whilst the plan does allocated space for a community centre, there is no funding for any additional services such as dentists and doctors.

SRBC Landscaping Officer - Is happy with the details submitted for the LVIA and has no further requirements at this time.