

## APPENDIX J

### Summary of Consultee Comments to Masterplan August 2020

**Lancashire County Highways** – provide views in respect of the August 2020 Masterplan on highways and transportation matters only. It is critical that all matters highlighted are suitably addressed to ensure the acceptable comprehensive development of the site and to demonstrate that it can be delivered with suitable levels of access provided at all stages.

It is not my intention in this response to provide detailed comments on the Transport Assessment (TA) required to support the delivery of this site through the planning process. However, the August Masterplan now includes a series of appended technical statements which includes 'Highways' in Appendix C and as such I will provide appropriate comment on this at this stage on page 13 below under the heading 'E - Highways Technical Note (Masterplan Appendix C)'.

For the avoidance of doubt there is nothing new raised in these latest comments in regard to the general principles of the Masterplan and the position that LCC Highways Development Support has maintained since the pre-application stage. This being that the Masterplan should ensure development of the site follows a properly planned approach and not piecemeal development. Deliverability and viability should underpin the development of the Masterplan and therefore ultimately demonstrate whether the document(s) are an acceptable basis for the development of the Masterplan site.

The following areas of the Masterplan are not considered acceptable at this stage and further information and evidence is considered necessary. I will address each matter in turn under the following headings:

- A - Masterplan Viability and Ultimately Deliverability of the Masterplan
- B - Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road
- C - Provision for Sustainable Movements
- D - Infrastructure Delivery Schedule
- E - Highways Technical Note (Masterplan Appendix C)
- F - Various other General Comments and Observations
- G – Properly Planned Approach as opposed to Piecemeal Development

#### **A - Masterplan Viability and Ultimately Deliverability of the Masterplan**

The executive summary of the August 2020 documents states 'This Masterplan has been prepared by Taylor Wimpey and Homes England ('the Developers') to guide the future development of one of the largest allocated sites in South Ribble...'

It remains LCC Highways position that the Masterplan, as presented, does not demonstrate the infrastructure necessary to support the scale of development to be accommodated can and will be delivered.

There is a need to ensure the Masterplan produced has followed an approach which best supports the development and delivery of the entire site and is not overly influenced by seeking to achieve the objectives of any one, or group, of potential developers of the site.

While the final layout of this major development site as set out within the Masterplan may not be unreasonable in many aspects, the delivery cannot be taken as a 'fait accompli', which is essentially the approach adopted and presented in the current submitted Masterplan. LCC Highways consider that a properly planned approach should start from a position that develops the Masterplan based on viability which in turn influences and informs what can be delivered both in terms of infrastructure and ultimately scale of development.

However, there has been no Masterplanning viability exercise and therefore agreed costing (with the LPA with support from the LHA) of the overall infrastructure requirements with specific analysis

to best understand how all elements can be funded and what the level of burden to individual developers/development parcels would be with consideration to when measures will be required. It is of concern to LCC Highways that the approach the Masterplan presents would potentially result in an unrealistic level of burden for latter and almost certainly smaller applications that come forward on the Masterplan site and in doing so would make these unviable.

This is why the fair and proportionate level of burden to be carried by all development must be identified at the masterplan stage, albeit without the level of detail that may be available as site development moves forward, reasonable best estimates can be made at this stage. The No. of dwellings are understood and the ultimate infrastructure requirements as set out in the Infrastructure delivery schedule (IDS) are a reasonable evaluation (in advance of agreement on detailed Transport Assessment). So while the exact trigger points are not known at this stage, and it is understandable why prospective applicants would want to keep a level of flexibility, the overall costing and equitable apportioning of the infrastructure requirements can be assessed and therefore the overall viability of the Masterplan as proposed, clearly understood. If following this comparatively straightforward exercise the outcome is that the Masterplan as presented is sound then we have a strong position from which to move forward to assess individual applications, necessary trigger points for infrastructure, other measures and services etc. to deliver comprehensive development of this strategic site, in a timely manner and in line with the local development plan. This removes uncertainty for future developers and land owners coming forward within the Masterplan area.

### **B – Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road**

A previous version of the draft Masterplan showed in Figure 11.1 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. This is important as it influences how the site may come forward. The assessment of when the CBLR is required is not simply a question of the number of residential dwellings delivered on the site and the associated trip generation. It is not simply about what the trigger point should be with regard to vehicular traffic. The need and reasons why the CBLR is required is set out in the local plan. It is to support the wider development aspirations of South Ribble BC and allow the comprehensive development of this major site. LCC Highways consider that to do this will require developing a Masterplan that would see the delivery of the Full CBLR at the earliest opportunity with consideration for viability (as set out in section A above), risk (planning permissions) which considers individual site parcels and as necessary the full CBLR including bridge over the West Coast Main Line (WCML).

The specific consideration to the timing of delivery of the Full Cross Borough Link Road must consider the need for appropriate Public Transport routing to/from the principle desire line, which is the Leyland Road corridor. It must consider early delivery of high quality sustainable provision and facilities (3.5m shared use facility on one side of CBLR and a 2.0m footway on other side for the full length of the CBLR tying in to wider infrastructure. These matters are addressed in more detail under Section C below on Page 8. The timing for the full CBLR must also support the comprehensive and sustainable development of the Masterplan site, supporting early delivery of the school and Local centre. The CBLR will provide a key desire line to/from the local centre and school from the wider built environment, in particular from Leyland Road.

Without doubt, a further factor must be assessment of traffic expected to use CBLR. It is expected that evidence to be collected and agreed with the LHA following the opening of 'the Cawsey' section of the CBLR will better inform this matter in due course. (Note: it must be recognised that any data collected at the current time will need to be factored to represent a pre Covid19 base). In an ideal world a comprehensive masterplan would be fully agreed in advance of any planning applications on site. Clearly the Masterplan should be considered objectively by the LHA on its own merits. However, in this case we are seeking to reach agreement on a site Masterplan for a major site for which two major applications have already been submitted. Therefore, it is also not unreasonable to consider the acceptability of the Masterplan as presented and the implications in regard to the currently submitted applications. For example, if it is accepted that the currently submitted CBLR application fulfils the local plan policy requirement this would raise the question,

what would be the risk to the delivery of the Full CBLR (new bridge over WCML and new junction on Leyland Road).

There is also a need to understand what the implications of 'short term' and 'long term' as referenced in the Masterplan and the applicants outline residential and CBLR applications. Consideration of the outline residential application would imply the applicants consider 'short term' could potentially mean delivery of their 1,100 dwellings in advance of the Full CBLR. This could imply a time scale of potentially 10 to 15 years before any acceptable CBLR connection to Leyland Road and the subsequent necessary provision for sustainable modes, including PT routing and vehicular access from the east to the school and local centre.

(Note: the current outline residential application considers 1,100 dwelling out of the 2000 dwellings that could come forward on this major Masterplanned site including safeguarded land; the TA also include a sensitivity test considering 1,350 dwellings, the full site allocation which includes third part land).

The land ownership plan referred to above showed that a site parcel to the west of the West Coast Main Line railway, which is outside of the land controlled by the current applicants (TW/HE), is required to deliver the CBLR. To come forward in line with the Local Plan this site would need to deliver, with no gaps within their site, the section of CBLR to tie in at each end with the land controlled by TW/HE as shown in their current application (i.e. removing any potential ransom). However, if this site came forward after the current HE/TW site as currently proposed then LCC Highways would have to recommend that a connection from A582 to Bee Lane was not completed as this would not deliver a safe and suitable route to accommodate potential movements, with regard to both vehicular and sustainable movements. The Full CBLR with new bridge and new junction at Leyland Road are necessary to overcome this issue and to deliver the vehicular and sustainable transport facilities appropriate for the scale of development proposed and to accommodate CBLR, local access and redistributed traffic.

Clearly there would potentially be viability issues for this site to deliver the remaining infrastructure to deliver the Full CBLR and therefore the Masterplan fails. The above is just one example, there are numerous potential scenarios where the deliverability of the comprehensive development of the site are put at risk by the Masterplan as presented and the failure to develop a Masterplan based on sound long term viability and deliverability.

Planning permission for the Full CBLR with new bridge over WCML

As highlighted, one of the risks to the current Masterplan is that it promotes an approach whereby a significant proportion of the Masterplan site could be developed in advance of the Full CBLR (and indeed in advance of any planning permission to be secured for the Full CBLR). This would also be in advance of the appropriate level of detailed design to ensure that the land necessary to deliver and construct the CBLR is understood and protected from development.

The risks associated with such an approach are highlighted when consideration is given to the applicants current outline residential application, whereby, land that may be required to deliver the full CBLR could potentially be given permission in advance of fully understanding what the requirements are in respect to the design of the new bridge and the land required to potentially remove the existing Bee Lane Bridge and construct a new bridge (including all land required to accommodate the associated construction compound and access for plant, storage of materials and siting of a large crane to lift sections of bridge).

The applicant has repeatedly stated that they have excluded the Full CBLR (WCML bridge section and junction with Leyland Road) as it is not in land within their ownership or control. However, this was not an issue for the applicants when submitting their application for the CBLR. The current application shows a route that runs between the proposed new access with the A582 and a priority junction with Bee Lane to the west of the existing bridge of the WCML. The route includes a significant section of land not in the applicants' ownership or within their control. The position the applicants have taken in regard to the Full CBLR has been a concern to LCC Highways from the

outset. It is our view that this position has been fundamental to the applicants approach to their Masterplan which has failed to demonstrate that the full route with new bridge and new junction with Leyland Road is viable and therefore deliverable.

It is LCC Highways position that the applicants currently submitted CBLR application does not deliver a CBLR or indeed any road that could be described as fulfilling this purpose, given the sub-standard nature of the provision for both non-motorised and vehicular traffic between the proposed priority junction with Bee Lane and the existing Bee Lane/Leyland Road roundabout. The applicant themselves acknowledge that the proposed scheme would only provide for a limited level of additional traffic. The applicants suggest this could allow up to a further 40 to 50 houses to be served of Bee Lane.

LCC Highways continue to review the amended plans and proposals the applicants have provided in regard to their current CBLR application and outline residential application. However, we have been clear in discussions with the applicant that we do not consider the CBLR application is acceptable as a route to meet the requirements of the CBLR (in line with the SRBC local Plan) and that we would not support the connection of this route to Bee Lane as presented.

### **C - Provision for Sustainable Movements**

I would not describe the current site as a highly sustainable location. It is for the Masterplan to establish the principles of how this site can be brought forward in the most sustainable way, ensuring that the proposals do not result in a car dominated/car dependant development. The detail of the necessary highway, public transport and sustainable links and the timing of their delivery will influence this and will be secured through subsequent planning applications. The Masterplan must ensure that piecemeal development does not compromise the comprehensive development of the site and as such limit the opportunities to deliver a highly sustainable site or undermine the ability to secure/deliver highway changes.

Any development on the site will increase both vehicular and pedestrian/cycle demand toward Leyland Road upon narrow lanes with currently no footway facilities and limited lighting. I do not consider the Masterplan proposals demonstrate that safe and suitable provision to/from the secondary access points of Bee Lane and Flag Lane will be achieved in what the applicant refers to as 'short term' (note: potentially 10 to 15 years). Given the scale of development that potentially could come forward and the number of vulnerable road users making sustainable movements (with particular reference to education and access to appropriate bus service on Leyland Road) this is a concern.

The absence or delay to high quality provision of sustainable transport measures can hinder development of a sustainable movement mind-set across a development. It is important to maximise the usability of alternative modes of transport to encourage cycling and walking at an early stage in development build-out. Given the length of time it usually takes to develop only a modest number of dwellings, it makes sense to promote sustainable transport use early, with a mix of actual provision and a travel plan for the site. The absence of safe and suitable, high quality infrastructure on the key desire lines to Leyland Road in the early stages of development will lead to a reliance on the car, which could be expected to perpetuate as the development grows. This approach was necessary before the start of the Covid19 situation, but appears even more important in the post-crisis period that we find ourselves in.

In regard to sustainable movements, the Masterplan must therefore address necessary infrastructure and the trigger points when infrastructure is required for sustainable access (pedestrian, cycle, and public transport considering the desire lines and local amenities and attractors). In this respect the Sustainability Plan in Figure 2.2 of the Masterplan document is a useful reference. This clearly shows a dominant draw to/from Leyland Road and the Lostock Hall area for amenities, services, retail, employment and education.

The sustainable links must provide safe and suitable access at all times of the day and throughout the year on well lit, surfaced routes on these desire lines. A simple test to gauge whether routes

being proposed deliver safe and suitable access is to ask yourself whether or not you would be happy with your child walking on the route. I address in more detail below the applicants approach which proposes shared use of existing roads within the site which are to remain to maintain required access to multiple existing properties and businesses as 'Quiet Lanes'.

Approach that requires use of Shared Space / Quiet lanes

The principle of the use of 'Quiet Lanes' as proposed by the applicant for the Pickering's Farm site has not been developed sufficiently in order for the LHA to consider the approach suitable. It must be understood that the scale of this development, and the phasing as proposed in both the Masterplan, CBLR application and outline residential application could, if approved, mean the final site and all infrastructure will not be delivered for at least 15+ years. So while it may not be unreasonable to use some of the existing lanes in the manner proposed as part of the final plan, it is the long interim period that causes concern. LCC Highways do not accept that the approach presented satisfies NPPF and delivers sustainable development. Consideration must also be given to the latest government advice in regard to shared space and LTN 1/20 in regard to appropriate provision for sustainable users.

The approach presented by TW/HE is to deliver all their site (1,100 dwellings) in advance of the Full CBLR and hence significant intensification of sustainable movements on these existing lanes. These lanes do not have safe pedestrian footways to cater for existing and new users (including attraction from beyond the site) for:

- Children going to the nearest schools (Penwortham Broad Oak Primary School and Kingsfold Primary School both to the north, Lostock Hall Academy, Lostock Hall Community Primary School, Our Lady and St Gerards RC Primary School to the east and Farington Moss St Pauls C of E Primary School - to the south of the site;
- Elderly and mobility impaired users; and
- Parents with pushchairs etc.

Traffic speeds on these, predominantly long straight lanes (currently derestricted and which will remain semi-rural for many years - even after development has commenced from the western edge) will not be self-enforcing to ensure that they are below the 20 mph maximum required. Clearly many sections of the proposed lanes will not be developed until much later in the development build out. Many of these lanes are unlit or have limited lighting provision and therefore do not present a suitable route at all times of day and throughout the year.

The desire lines via the existing lanes (Bee Lane, Lords Lane and Flag Lane) do not present acceptable shared use routes. The Masterplan needs to demonstrate that the site can be brought forward in a safe and sustainable manner from the early stages. I consider the current Masterplan fails to do this!

I consider the approach will need to give much greater consideration to review of the current use of existing lanes and current access of existing properties and how these may need to be altered to create the necessary safe pedestrian environment. The approach will need to identify how pedestrians can be segregated from vehicular traffic (footpaths or off road provision on desire lines).

It is clear that as the site is built out and phases are brought forward (with new access and highway/sustainable movement access infrastructure) the traffic management measures on the existing lanes will need to be reviewed and amended. This approach is necessary with delivery of development on a large site where multiple existing properties and the existing access routes are to be retained.

It is not clear what consideration has been given to equestrians as part of the Masterplan.

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.

I 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. Any cost associated with changes to Public Rights of Way as a result of the proposed development will need to be borne by the developer, whether physical measures or the legal procedures.

#### 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 1400m to the nearest PT stops on Leyland Road and 600m and 700m to stops on Kingsfold Drive, these will be typical walk distances for the residents of the dwellings delivered in Phase 1 of the proposed Masterplan. These distances would not be considered acceptable in most circumstances. Guidance highlights a maximum walk distance of 400m to a bus stop. Where the provision for pedestrians is considered poor the distance creates and even greater barrier to achieving sustainable development (see above regarding the need for safe walking routes for all users (including mobility impaired), lit, with appropriate surfacing and suitable for use at all times of day and throughout the year.

The masterplan indicates in the long term future penetration by public transport into the site with potential access from A582 Penwortham Way, Kingsfold and Bee Lane. However, the initial proposals suggest PT routing only via the main site access via A582 Penwortham Way. Such a diverted service would disadvantage existing users and is not acceptable to the highway authority. This strategy is unlikely to be sustainable post any PT funding. Clearly the ideal public transport route would use the CBLR linking the built environment of Lostock Hall, Tardy Gate, and Kingsfold and further afield using the Leyland Road Quality Bus Corridor. 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 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.

I note that potential travel plan measures are now included within the revised Access and Movement (section 6) of the Masterplan document and in the IDS.

#### **D – Infrastructure Delivery Schedule (IDS)**

The Masterplan includes an Infrastructure Delivery Schedule Document (IDS). The applicants have stated that The Masterplan, Design Code and IDS have been prepared to require comprehensive development to come forward within the site on land owned and/or controlled by the Developers and on third party land. The IDS now seeks to provide commentary on how the latter phase of the site would be delivered and some further information on the delivery of the CBLR on third party land and the railway crossing is provided in the table on page 6. The IDS and the accompanying table on page 6 has been updated to provide an indication of which infrastructure elements could be delivered through S106, CIL, S278 and S38 agreements (it is important that the IDS is complete in all matters and should highlight that delivered directly by development (and where possible having regard specific plots/sites) or by other means, this removes any future ambiguity).

However, as previously stated there is no costing estimate/consideration for viability and the timing for the delivery of this infrastructure remains open ended (LCC Highways has concerns in regard to masterplan viability, Full CBLR design, new bridge and junction with Bee Lane, scheme cost estimates and planning requirements, including agreed responsibility for delivery).

#### Access Strategy

The Masterplan for the site indicates vehicular access will be taken from a number of new vehicular access points at the following locations:

- A582 Penwortham Way
- Bee Lane onto Leyland Road

- Flag Lane onto Leyland Road
- Coote Lane; and
- A proposed bus link to the northwest of the site towards Kingsfold

#### Street Hierarchy

The primary spine road from A582 is proposed as a 7.3m wide carriageway with 2m footway on one side and a shared 3.5m wide pedestrian/cycleway on the other side. This shared pedestrian/cycleway will link into the wider A582 dualling provision.

The detail of the secondary access to the site has not been agreed. 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 will 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.

The current layout of the Leyland Road/Bee Lane roundabout is adequate for the current very light vehicular use from Bee Lane. However, the arrangement over the bridge and the junction layout is not to satisfactory standards to support any significant uplift in traffic numbers. Therefore, while the junction could possibly support a small increase in vehicular movements, this would not be supported until all matters are satisfied and highway changes agreed.

Proposals to date have not suitably addressed how the Bee Lane access and adjacent bridge crossing over the West Coast Main Line (WCML) will accommodate the combined addition of vehicular and sustainable movements that could be expected to be generated by this proposal in the interim period (which with consideration to the phasing proposals is potentially 15+ years) prior to delivery of the full CBLR and new junction at Leyland Road.

#### 'Short and Long Term'

The text in the Access and Movement section (Section 6) of the Masterplan document refers to 'Short' and 'Long Term' options. I consider this phrasing without greater clarification to be, at best vague and potentially misleading.

Short term and long term vehicular access options connecting to Leyland Road in the north eastern corner of the site are proposed. The short term option is a priority 'T' junction arrangement connecting the CBLR extension to Bee Lane utilising the existing Bee Lane bridge to connect to Leyland Road. The Masterplan proposals is that the short term access option will be restricted to use by existing properties on the site and 40-50 new dwellings. The long term option is a new bridge over the WCML connecting the CBLR extension with Leyland Road.

An indicative access option (bus only link) is shown for the Kingsfold Drive link on page 33 of the Masterplan. LCC Highways have repeatedly indicated that there is advantages in an all vehicular access on a circuitous route for a limited level of local traffic.

Proposals are also shown for access via Flag Lane. The proposals provide sub-standard provision for vehicular and pedestrian access over the bridges. The limitations of the Flag Lane access proposals would only accommodate a limited level of movement.

I consider the reference to 'short term' in the Masterplan misleading. Based on the currently submitted outline residential application, acceptance of the Masterplan as presented would clearly indicate 'short term' to be up to 1,100 dwellings or 10 to 15 years. Restriction of total numbers on Flag Lane appears simple only if the final full Masterplan infrastructure is built out and considered. However, given an interim potential 'short term' of 15 years (assuming somehow a suitable mechanism is identified to fund the necessary infrastructure) this presents numerous questions in regard to access for both existing and new dwellings. If a properly planned approach is not developed, it could be expected that at every opportunity future developers will seek to secure development without the burden of the infrastructure needed to complete the full CBLR. This will

lead, as can be demonstrated on many other sites over the years, to significant delays in the release of the wider site. This has implications for the comprehensive development of the site and early delivery of key components of the Masterplan such as the school and local centre. Therefore as highlighted in this section above, the IDS needs to go further than simply identifying the 'final' necessary infrastructure. In regard to the IDS, access to the local centre and proposed school should be addressed, again considering the necessary infrastructure

and the potential trigger points as to when this infrastructure will be required, both from within the site and from the wider external built environment into the new local centre and the proposed school.

I would note that following discussions with the LEA, the school site has been moved further to the north and is to be accessed off a secondary road. A drop off parking facility for the school is also shown on the revised Masterplan document on page 2;

Access to school site in its new location, utilising Bee Lane would be a very attractive proposition for parents dropping of a child. In the potential 10 to 15 years 'short term' that could result given the Masterplan approach presented, this would prove very difficult to control and could result in even greater issues at the Bee Lane/Leyland Road junction.

In section A above, the requirement to underpin the Masterplan with consideration for overall viability was highlighted. The overall infrastructure requirements, their costings, delivery and viability have not been considered by TW/HE to date. Validation of the Masterplan should aim to ensure that proposals are equitable and fair to all developers/landowners. With consideration for the phased build out of the masterplan site it is also important to demonstrate validation of the phasing, costing and necessary infrastructure delivery. The Masterplan validation will therefore also require consideration of triggers for indicative delivery of infrastructure associated with phased build out. Once this assessment is provided the LHA and LPA will be in a position to better understand how the development of the site can come forward over the entire period of the build out.

### **E - Highways Technical Note (Masterplan Appendix C)**

In seeking to address some of the comments received in earlier consultations, which requested that further detailed technical information be included in the Masterplan, the main Masterplan document now includes a series of technical statements appended addressing; highways (Appendix C), ecology (Appendix D), Flood Risk and Drainage (Appendix E), and Landscape (Appendix F). Reference is provided to these technical appendices throughout the main Masterplan document.

#### **Traffic and Highway Network Conditions (Pre Covid19)**

The immediate existing highway network on both the east and west side of this major application site presents challenges in supporting sustainable development. Leyland Road is one of the most congested corridors in the area, not only during peak periods but at many other times of the day and at weekends.

On the A582 corridor there have been a number of recent junction upgrades as a precursor to the proposed dualling scheme, however, the A582 still experiences queuing and delay during peaks for extended periods at pinch points. The need for both the A582 dualling scheme and the CBLR to support further development aspirations has been well documented for many years.

The traffic assessment produced by the applicants to date, including that which is presented to support the Masterplan in Appendix C, is not accepted by LCC Highways. The network information does not reflect the congestion and delay experienced on a daily basis (Pre Covid19) by regular and familiar users of the network. The validation of Base Models is not accepted. Discussions are ongoing in regard to this point and the applicant has indicated they will be carrying out further work to address concerns.



While some elements of the Transport assessment have been agreed, such as the development trip rates (they are consistent with rates approved elsewhere in the district/and within NW Preston), the forecast traffic assumptions are not agreed. There are issues that have been identified and which need to be addressed in regard to committed development traffic and potential CBLR distribution/re-distribution. While the applicant has considered and included their views in regard to committed development, a number of issues have been highlighted and as presented this is not acceptable. Discussions are ongoing in regard to this point and the applicant has indicated they will be carrying out further work to address concerns.

The CBLR will provide a key desire line, not only for sustainable modes but also for private cars, to local employment, retail and other amenities. It has been established and agreed with the applicant that at least 40% of the full site traffic would wish to route via Leyland Road and for local site traffic to access CBLR (Cawsey to Carwood Road and the A6 and Preston east, Walton-le-Dale and Bamber Bridge). Without doubt, a further factor must be assessment of local traffic expected to use CBLR. Evidence to be collected shortly following the opening of 'the Cawsey' section of the CBLR will better inform this matter in due course.

The Transport Assessment (TA) produced for the outline residential application 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.

#### **F - Various other General Comments and Observations**

The text in the final paragraph of Masterplan section 6 - Access and Movement section (Section 6) states 'The strategy has been discussed with LCC during the various meetings and liaison described in the consultation section...', this implies that the approach has been developed in consultation with LCC Highways and in so doing has been agreed. While I would agree that the matters have been discussed as part of the consultation process LCC Highways have made our views clear as demonstrated by the extensive comments above setting out our continued concerns. As such the phrasing is considered somewhat misleading.

#### **Parking and proposed 3G Sports Pitch**

Although not within the site, a new 3G sports pitch is proposed on the existing pitches adjacent to the existing Community Centre at Kingsfold. There is a reasonable level of parking at present, however, consideration will need to be had for changes (highway link and intensification of use) in regard to appropriate parking provision. In delivering the highway link this can be expected to require other changes that require the support of the Penwortham Town Council.

#### **Existing Rights of Access**

The site is currently occupied by a number of individual properties in private ownership which are accessed via Bee Lane, Flag Lane, Lords Lane, Moss Lane and Nib lane. Previously in our comments LCC Highways noted the following:

- There is a need to ensure all existing rights of access are maintained or acceptable/appropriate alternatives provided, including 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.

Having regard to the above, it is not clear whether the applicant has given this any further consideration. On page 33, within the Access and Movement section the Masterplan simply states, 'All existing rights of access will be maintained with acceptable alternatives provided where appropriate'.

While LCC Highways has been provided with some plans showing potential proposals and options for the stopping up of the individual lanes and creation of turning heads to control access, while maintaining local access, this does not explicitly address the concern raised. LCC Highways have seen at least one letter from a resident in response to the consultation that suggests they have access rights in their title deeds along Nib Lane. Existing access rights may prevent the delivery of the Masterplan proposals as presented and the changes and use of the rural lanes as required by the applicant and the approach presented in the Masterplan.

(Note: where a stopping up/diversion is required in order to implement a planning permission the stopping up/diversion is carried out under the Town and Country Planning Act. The decision on whether an order will be granted is made by the Secretary of State.

#### Network Rail Consultation

This next section addresses matters that relate to the LHA and Network Rail. A response to the Outline application and CLBR application submitted by TW/HE was provided on the 2nd of March 2020 and reference is made to those comments. At present LCC is not aware that these concerns have been addressed. A number NR's concerns are shared with the LHA and are yet to be addressed to our satisfaction.

The uplift in traffic over the bridge is a matter of concern for Network Rail and the LHA. It should be noted that Network Rail make this comment in reference to the full CBLR being constructed. Comments have not been provided on what Network Rail would consider an acceptable level of traffic. It is stated that the Railway bridge 113 (Bee Lane), maintained by Network Rail, suffers from settlement and the condition of the bridge is likely to deteriorate if utilised for increased traffic loading. Notably, Network Rail state, 'in its current state the bridge is unsuitable for a proposed link road'. An objection has been raised pending an assessment of the bridge and the LHA making a commitment to taking ownership of the bridge. These, including the latter, have not been overcome.

The Masterplan has not been updated in light of those comments submitted, and does not provide a clear picture of the additional impact that could be accommodated on the bridge, nor explaining adequately to whom the cost, responsibility and ownership will fall. A costed estimate is not included, the strategy for delivery is not presented. There is no demonstration of the level of traffic that could be tolerated by Railway bridge 113 in the short term (having regard for the potential 10-15 year short-term as previously raised). Whilst a Masterplan typically deals with 'broad' details, these issues raised by Network Rail and how it is proposed to overcome them have a significant influence on any applications coming forward, and fundamentally, the ability of authorities to accept the risks presented and agree the impact of development has been managed acceptably. It is not in the public interest to accept a Masterplan with this information missing due to the possible consequences if this detail is overlooked at this stage. The consequences include, but are not limited to, issues with the WCML and train services caused by bridge structural issues; access for sustainable users falling short of those required (even if this is serving only a small number of vehicular movements, it could serve the entire site in terms of active travel); access being maintained; public cost if the bridge is not adequate, fails, or is damaged; inability to appropriately manage traffic into the site (including consideration for potential construction traffic); inability to prevent heavy parking up on this lane; the cost associated with these effects. These can to some degree be designed out from the outset and that is in part the role of the Masterplan to outline how these risks will be eliminated. The residual issues are a risk that are taken on by the LHA and Network Rail.

In considering the implementation of a new bridge, regard needs to be had for the layby requested by Network Rail in order to maintain access following an uplift in traffic (see NR comments). Additionally, bridge alignment; removal of the old bridge; construction requirements and crane siting etc. will all require consideration in order to provide assurance that the works can take place and the Masterplanned site can come forward in a way that does not cut off access for existing residents. This detail is not provided and the potential issues are not assessed because the proposal lacks the information to adequately identify what the issues will be, when they will occur, or how they will be overcome.

Once these matters have been considered adequately, it may be possible for the LHA and Network Rail to reach agreement.

Access to Holme Farm Dairy and other existing Commercial uses on the Site

In regard to access to Holme Farm Dairy, I note the previous draft Masterplan stated that following consultation a direct link from Holme Farm Dairy to the new road access will be provided. As previously highlighted, all access points will need to consider the existing commercial land uses and be constructed where necessary to appropriate commercial vehicle standards.

#### Sustainable Urban Drainage Systems (SuDs)

LCC are the Lead Local Flood Authority (LLFA) and as would be expect, LCC Flood Risk Assessment (FRA) team have been consulted separately. I note that FRA provided formal comments, dated 12th March 2019.

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.

In regard to the Masterplan proposals I would note that, in general, LCC will seek to limit the use of culverts where alternative sustainable solutions can be found.

#### G – Properly Planned Approach as opposed to Piecemeal Development

With consideration for all the comments and concerns raised in sections A to F above It is LCC Highways view that the Masterplan approach proposed by the applicants (TW/HE) is likely to result in piecemeal development. Albeit one large site accessed from of A582 Penwortham Way and a series of smaller sites served of various other secondary access locations a number of which as presented would be sub-standard in regard to both vehicular and sustainable access provision. LCC Highways consider that approval of the Masterplan as submitted would allow the currently submitted applications to proceed toward a decision on the basis that it is not necessary to understand how the final Comprehensive Masterplan site infrastructure will be delivered.

The current outline application highlights that they do not prejudice the delivery of the Masterplan, including the CBLR, but that its full delivery is not within their control. Rather than starting from a position of what is necessary for this Masterplan site and then addressing how this will be delivered, the Masterplan development has been primarily focused on presenting an approach which satisfies the objectives of TW/HE and their current submitted outline application for up to 1100 dwellings.

It is of concern to LCC Highways that the approach the Masterplan presents would likely result in a level of greater burden for later applications that would come forward on the Masterplan site, making these potentially unviable. With piecemeal development each later emerging parcel of development is unlikely to deliver the infrastructure requirements. This is likely to result in planning 'stand-off' and potentially a series of Public Inquiries where future development applications would argue their comparatively small impact does not warrant the unreasonable burden being requested.

This is why the fair and proportionate level of burden to be carried by all development must be identified at the masterplan stage, albeit within reasonable best estimates available at this early stage. The number of dwellings are understood and the ultimate infrastructure requirements as set out in the IDS are a reasonable evaluation (in advance of agreement on detailed Transport Assessment).

(Note: so while the exact trigger points are not known at this stage, and it is understandable why prospective applicants would want to keep a level of flexibility at this stage, the overall costing and equitable apportioning of the infrastructure requirements can be assessed and therefore the overall viability of the masterplan as proposed. If following this comparatively straightforward exercise the outcome is that the Masterplan as presented is sound then we have a strong position from which to move forward to assess individual applications, necessary trigger points for infrastructure and services etc. to deliver comprehensive development of this Strategic site in line with the Local development plan.)

The Masterplan is the document to ensure piecemeal development does not come forward on this site. As presented this masterplan does not provide the clear path to delivery of the Masterplan site, but does support the applicants currently submitted planning applications. The matters raised in these comments are not new they have been raised by LCC Highways and others previously and while there has now been numerous updates to the Masterplan, fundamental issues remain outstanding.

### **Summary and Conclusion**

These comments consider the Masterplan (August 2020) and present highways and transportation matters identified as potentially significant issues that should be given further consideration and addressed within an updated and agreed Masterplan for the site. The final Masterplan should then inform all currently submitted and subsequent planning applications.

LCC Highways consider the following areas of the Masterplan are not acceptable, as set out in detail in the comments above. Further information and evidence is considered necessary, this includes:

A - Masterplan Viability and Ultimately Deliverability of the Masterplan

B - Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road

C - Provision for Sustainable Movements

D - Infrastructure Delivery Schedule

E - Highways Technical Note (Masterplan Appendix C)

F - Various other General Comments and Observations

G – Properly Planned Approach as opposed to Piecemeal Development

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.' LCC Highways have reviewed the submitted Masterplan Plan and associated documentation and considers that further information is necessary to demonstrate the Masterplan, is considered sound by the highway authority, can and will deliver necessary and appropriate infrastructure and sustainable links with connectivity to the wider network at the time required to support comprehensive development of this major site for development while satisfying relevant policy.

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.

Therefore, I would recommend the application is considered but the decision deferred in order that the applicant may engage with the planning authority, taking on board planning committee recommendations, and also the views of LCC Highways with the aim to address the matters highlighted in these comments.

If a planning decision is to be made at this stage our recommendation must be one of refusal with the reason being lack of necessary information and not satisfying relevant policy.

**Highways England** - In terms of the updated Appendix 'C' transport chapter of the Masterplan, the document revisions do not address the areas of concern that they raised in their latest response to the current outline planning application for 1100 dwellings. Highways England therefore request that this section of the Masterplan seeks to incorporate the level of information that has been requested.

Additionally, no mention is made of the strategic road network (SRN) - paragraph 1.1.5 of the Masterplan transport chapter states that *"This assessment has been requested by Lancashire County Council (LCC), the local highway authority, to inform their consideration of the Masterplan only"*, when in fact it is necessary to understand what the impacts of the additional traffic growth generated by the full 2000 dwellings upon the SRN would be.

Because of the connection between the Masterplan (as the guiding planning document for the overall site allocation) and the known individual portions of the site coming forward as planning applications (such as that currently for 1100 units), sufficient scenarios should be presented within the Masterplan to allow evaluation of this. Highways England recommend that the Masterplan should be presenting this information for consideration along with the 1,100 dwellings in for planning.

**Network Rail** - is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network and associated structures. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

Whilst Network Rail have no major concerns regarding residential development within this area, we do have concerns regarding the impact upon the railway, and associated infrastructure; particularly the adjacent bridges which span over the railway along the eastern boundary to the site. These bridges include, Bee Lane, Flag Lane, which is actually 3 structures. We would like to raise the following concerns:

- It is noted that the Masterplan indicates that a new overbridge is required to accommodate the significant increase in traffic flows predicted as a consequence of the overall development. Also noted is that no mention is made of who will finance the new structure or when it will be open for use.
- The new overbridge needs to be installed and operational prior to occupation of the intended development. Bee Lane and Flag overbridges are narrow structures which each carry single lane traffic. Neither can accommodate bi-directional traffic and known issues of subsidence exist in the area, for which both structures are monitored during routine Network Rail examinations.
- The developer's proposal to construct a footway on Bee Lane overbridge does not appear feasible. Although Network Rail is yet to receive dimensioned plans of such, there seems to be insufficient space to incorporate a footway over the entire length of this structure.
- If following Network Rail's review of such plans sufficient space is found to exist, it is very important to note that bridge parapet height must also be increased to achieve compliance requirements. All aspects of such works must be fully funded by the external proposer.
- Only NR approved designers and contractors are permitted to undertake works to NR assets. Proposals to alter any NR structure first require the submission of design drawings detailing the scope of the aspirational change and, in this case, show how - during implementation phase - disruption to current overbridge users shall be mitigated.

- Should any aspect of the proposed works to Network Rail assets be agreed, the project will be required to enter into various agreements detailing how Network Rail costs will be captured in full throughout the project lifecycle.
- The masterplan must also consider the potential impact of the development on the Footpath/bridleway network, with particular reference to Level Crossings. The proposed development may lead to an increase in pedestrian footfall at some or all of NR's level crossings in the area and this potential increased use would raise safety concerns. Network Rail therefore reserve the right to make further comments when details proposals are submitted.
- There is a third bridge to the south east of the development. Although the bridge has not been specified within the masterplan as having any traffic impact, it is important to consider all structures where there might be any increase of overall use.
- The Homes England and Taylor Wimpey proposal has suggested that Bee Lane would only service an extra 40 dwellings, however once the internal link road is completed it would service the whole of the development which could be up to 2,000 dwellings. In the Masterplan document starting on Page 77 point 3.3.4 it states 2,000 units with the full link road delivered across the site, and a new bridge utilising third party land connecting to Leyland Road. This assumes 200 dwellings accessing via the new access onto Chain House Lane and 1,800 dwellings accessed via the link road, with 60% of this traffic accessed via Penwortham Way and 40% via Leyland Road, split via Bee Lane and Flag Lane on a geographical basis. This assessment is considered a worst-case scenario, (the full site allocation). This would mean in the region of 800 dwellings would be accessed via Bee Lane and Flag Lane which would be an unacceptable level of vehicles using the bridges.
- Construction traffic must not use either Bee Lane or Flag Lane overbridge for the purposes of accessing/ egressing the proposed development.
- The current proposals are insufficiently detailed to enable Network Rail to understand the potential effects on all of its assets and infrastructure. We therefore reserve the right make further comments when detailed proposals are made available to us.
- The current Network rail access point on the approach to Bee and Flag Lane overbridges provide 24/7 maintenance and emergency access to the railway and must remain obstructed.

All developers are requested to engage with Network Rail to understand the impact of their plans at an early stage of the development process.

### **National Grid Electricity Transmission and National Grid Gas**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Following a review of the above Development Plan Document, they have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the National Grid assets is: **ZQ ROUTE TWR (120 - 186): 400Kv Overhead Transmission Line route: PADIHAM - PENWORTHAM**

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National

Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

### **Guidance on development near National Grid assets**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

**Police Architectural Liaison Officer (ALO)** - One of the additions in the Design Code is the reference to Secured by Design. This is at point 3.2 and reads as follows - *All shared surface roads, as well as walkways and cycle storage needs to be designed to the latest Secure By Design standards (Secure By Design New Homes 2019).*

This reference to Secured by Design is supported, in addition, in order to reduce the opportunities for crime, to keep people safe and feeling safe and to reduce demand on local policing teams, it is recommended that Secured by Design should be embedded within all elements throughout the entire design code. Secured by Design certification should be incorporated into all sections of the design code highlighting that all aspects of the development should achieve Secured by Design certification. Boundary treatments, physical security of doors and windows and the layout of the scheme should all comply with Secured by Design New Homes 2019 requirements.

Images of proposed dwellings within the design code have features that would be discouraged from a security perspective such as deep recessed doorways and other proposed dwellings show flat canopies over front doors rather than pitched.

Security measures and Secured by Design should be incorporated into the Masterplan in accordance with The National Planning Policy Framework and Crime and Disorder Act.

**Greater Manchester Ecology Unit** – Due to the Ecologist's leave, the response from GMEU has been delayed and any comments received will be reported verbally.

**Lancashire County Archaeologist** - agree with the conclusions reached in the December 2019 Masterplan document (Section 7.0 Environmental and Site Considerations) that the site could be considered to have a 'low potential for the presence of currently significant non-agricultural remains of all periods'. This should however not be taken to mean that there is a nil potential for such remains to be encountered, the site is a large one, nearly 54ha. in area, and one not previously subject to any formal archaeological investigation. Further post-permission (but pre-commencement) archaeological investigation of the site has been proposed in CgMs Heritage's Historic Environment Desk-Based Assessment (August 2019), comprising of at least a first stage of evaluation by means of geophysical survey and/or trial trenching. The need for any further archaeological investigation of the site would be then be dependent on the results of this first

stage. This would, on the basis of what it currently known about the site, be considered an appropriate means of mitigating any adverse impacts of the proposed development.

It should however be noted, that in agreeing the Masterplan in advance of these works being undertaken, were significant or extensive archaeological remains to be found to survive within the proposed development, options either for their preservation in situ, or the potential ability to make changes to the layout in order to avoid the need for potentially expensive and time-consuming archaeological investigation of the site, will be greatly reduced, or lost entirely.

**Penwortham Town Council** - at its meeting on 1st September 2020, discussed, at great lengths, the new Masterplan and have made the following comments:

Penwortham Town Council would like to oppose the adoption of the new Masterplan in its current form for the following reasons:

Policy 4 of the Penwortham Neighbourhood Development Plan (NDP) states that new residential developments should provide 10% of the development for retirement properties through a range of property types, in particular, to provide bungalows. This, the Town Council feel, has not been addressed in the Masterplan.

The Town Council discussed the use of apartments as residential properties for older people and felt that this was inappropriate. The isolation of older people in Penwortham is of concern to the Town Council and one that we attempt to address through the many community facilities and support groups that we provide. The concern of the council is that providing apartments for single, elderly people will only enhance the isolation, whereas a single level property with a garden area will help break this feeling and encourage a more interactive community.

The Town Council also feel that the siting of apartments close to the proposed primary school is inappropriate as the noise levels created from the school would cause issues for any elderly residents living in this accommodation.

There are two primary schools within walking distance of the proposed new development, both of which do not currently run at full capacity. The Town Council would like to seek assurances that the proposed new primary school will not be built until both Kingsfold Primary School and Broad Oak Primary School are nearing full capacity and there is a proven need for the new school.

Policy 6 of the Penwortham NDP states that additional sporting facilities arising from the development should provide additional or enhanced facilities at the site. The Town Council feel that the provision of a 3G sports pitch does not provide adequate additional facilities for the extra burden of the development and as such feel that the Masterplan fails to address this policy.

Policy 7 of the Penwortham NDP states that the Town Council will promote the Penwortham Community Centre for wider usage and commit its resources to extend the facilities. The Town Council would very much like to work with partners, whether through a S.106 agreement or other options to extend and enhance the community centre operation in its current position.

The Masterplan proposes a road from the new development, directly past the front of the community centre, cutting off the centre from its car park. Whilst the Town Council fully understand that this through road is only intended for public transport and emergency vehicles, the council do have great concerns that this restriction will not be policed and this road will become a main thoroughfare into the site and indeed a "rat run" into and out of the new development. If this is the case the Penwortham Community Centre, as is, will not be fit for purpose with the majority of users of the centre, including the elderly, infirmed, parent/carer and children and other vulnerable users, not being able to park on the centre car park and gain access to the building.

In previous Masterplans there have been provision for a new community centre being built adjacent to the playing fields on the edge of "The Lanes" development. The Town Council would



like to seek assurances that should the development go ahead and should the road to the fore of the current centre be built then options will be given to relocate the community centre to a new site and that this can be arranged through a partnership agreement.

The Town Council would always prefer to extend and enhance the facilities at the current site of the Penwortham Community Centre but feel that a through road to the fore of the centre would make this totally unpractical.

Policy 8 of the Penwortham NDP states that a Penwortham Cycle and Walking Route will be protected from any form of development that would prejudice the delivery of such a route. The Town Council feel that the use of Bee Lane as an entrance to this site does prejudice the suggested cycling/walking route as the width of Bee Lane over the entrance bridge is by no means wide enough to allow pedestrians, cyclists and motor vehicles to pass safely, and as such the Town Council feel that the Masterplan fails this policy.

The Town Council feel that the use of the part of Bee Lane, as indicated on the Masterplan, as an entrance to the site, is not suitable and, although the Masterplan indicates that this is only “short term”; as there doesn’t seem to be support from any of the partners involved, to build a replacement bridge with enough capacity, the “short term” may well become permanent, which the Town Council feel is totally unacceptable.

The Town Council have always been led to believe that the proposed City Deal, which included a dual carriageway development of the A582, was in order to enable the development of sites such as The Lanes, Pickerings Farm. As the dualling of the A582 is now in doubt, does that mean that the developments along this route will no longer have the necessary infrastructure and as such, will no longer be viable?

**Sport England** – note that the main changes from a Sport England perspective relate to the following:

- The community building being removed from the Masterplan with a proposal to extend the existing Community Centre.
- A new 3G sports pitch which is proposed to be located on the existing pitches adjacent to the existing Community Centre.

The location of the above draft proposals will be on a site considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require **statutory consultation**, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

The 2015 Order defines a playing field as “the whole of a site which encompasses at least one playing pitch”. The definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. It also does not differentiate between different types of ownership e.g. public, private or educational ownership.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) and against its own Playing Fields Policy, which states:

‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

E1	A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
E2	The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
E3	The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none"> <li>▪ reduce the size of any playing pitch;</li> <li>▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);</li> <li>▪ reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;</li> <li>▪ result in the loss of other sporting provision or ancillary facilities on the site; or</li> <li>▪ prejudice the use of any remaining areas of playing field on the site.</li> </ul>
E4	The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field: <ul style="list-style-type: none"> <li>▪ of equivalent or better quality, and</li> <li>▪ of equivalent or greater quantity, and</li> <li>▪ in a suitable location, and</li> <li>▪ subject to equivalent or better accessibility and management arrangements.</li> </ul>
E5	The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:  
[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

The proposal being considered as part of the draft masterplan is for an extension to the existing community centre and a new 3G pitch which is proposed to be located on existing pitches to the existing Community Centre.

Any future applications would therefore be considered against Exceptions E2 and E5 of the above Sport England Playing Fields Policy.

*E2 - The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.*

*E5 - The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.*

Whilst it is noted that the Penwortham Neighbourhood Plan (Policy 6) sets out that the Town Council have worked through the Masterplan preparation for the Pickerings Farm site to locate the new sporting facilities adjacent to the existing Community Centre, the detail of the development still needs to comply with other Local Plan Policies, National Planning Policy Framework (Paragraph 97 (c) and Sport England's Playing Fields Policy.

As part of the assessment and consideration of this masterplan under the terms of a memorandum of understanding that Sport England has with the National Governing Bodies for Sport, Sport England has sought the views of the Football Foundation (FF). The comments from FF have been summarised below for information:

- *As evidenced in the 2018 PPS, South Ribble Borough Council has a shortfall of one no. full size AGP. However, based on the most up to date affiliation data, the recent LFFP (May 2020) indicated that shortfall had in fact grown to two no. full size AGPs. It should be noted that the 2018 PPS did acknowledge this possibility within its future demand calculations.*
- *Based on the aforementioned shortfall, South Ribble Council commenced discussions with the FF and Lancashire FA in March 2020 with regards to the development of a 'Hub' site, in accordance with the priorities of the LFFP. The identified location for this 'Hub' site was Bamber Bridge Leisure Centre. The intention, following an appraisal of all sites in the Borough, is to deliver two no. full size AGPs at Bamber Bridge Leisure Centre which would address the AGP shortfall. As such, this would address the shortfall and strategic need.*
- *As summarised in Sport England's previous response to this particular planning application, the scale of the development will clearly increase the demand for facilities such as AGPs. As such, there may be a need for an additional AGP in this area however **there is no robust evidence base at this stage to determine whether this site would be an appropriate location.** The location identified at the Pickerings Farm Masterplan is approximately 2.5 miles from the preferred 'Hub' site location at Bamber Bridge Leisure Centre and so hence the need for a robust evidence base for this proposed location.*
- *The Football foundation would appreciate further discussions with the Council and/ or Developer.*

### **Assessment against Sport England Policy/NPPF**

Based on the above observations made by the Football Foundation and in consideration of the draft Masterplan and accompanying IDP, no evidence has been submitted or included to accompany the masterplan that determines that the provision of a 3G pitch in this location will meet the requirements of paragraph 97(c) of the NPPF and the following exception to Sport England's Playing Fields Policy:

*E5 - The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.*

Whilst Sport England does not wish to discourage new sport facilities, where they result in the loss of grass playing field, it is essential that there are sufficient benefits to the development of sport as to outweigh the detriment caused by the loss of the playing field. The reason for this approach is because a grassed playing field can be used for a number of sporting purposes whilst a 3G pitch is a fixed structure, with fixed dimensions which is only suitable for a limited number of sports. It therefore can't be moved or resized to cater for any changes in sport requirements that may be required.

In seeking to balance the potential loss of playing field against the provision of a new indoor or outdoor sports facility, Sport England consider the following factors:

- **The need for the facility** – Will the proposed facility meet an identified local or strategic need, e.g. as set out in a local authority and/ or a sports governing body strategy.
- **Community use** – Will the facility secure sport-related benefits for the local community?
- **Sports development** – Will the facility be linked into the local sports development network?
- **Local level of pitch provision** – Does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal?
- **The physical location of the new facility** – Is it easily accessible by the community? Would the proposal displace existing users?

- **The Location of the proposed facility** – Will the proposed facility have an unacceptable impact on the current and potential playing pitch provision on the site. Could it reduce the capability and flexibility of the playing field to provide a range of sports and playing pitches?

In light of the above, Sport England **is unable to support the proposal for a 3G pitch as set out in the draft masterplan** at this stage.

Sport England would be happy to reconsider its position should evidence be provided to support the masterplan/ application. As set out above this would need to be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or the prejudice to the use of the playing field.

**Sport England further response 4<sup>th</sup> September 2020** - note that the revised Masterplan will remove all specific references to the provision of a 3G Pitch at this stage owing to the lack of robust evidence to meet the requirements of paragraph 97 (c) and Sport England's Playing Fields Policy.

In terms of the suggested replacement wording, Sport England is happy for the amendments to be made. It is however worth making it clear that any future investment/ improvements to the existing playing field should be informed by the most up to date evidence (Playing Pitch Strategy) available regarding the existing sports facilities/ playing field. It is also likely that any future proposal will require statutory consultation with Sport England and therefore if consultation is required any proposed investment will need to be considered against paragraph 97 of the NPPF and one or more of the five specific exceptions set out in Sport England's Playing Fields Policy.

**United Utilities** – re-iterate their response to the previous Masterplan consultation and also their response to the latest planning applications for the development. They wish for these to be referred to as our response to this consultation as the matters raised previously have not been fully reflected in the updated Masterplan.

We are particularly disappointed to note that the IDS still doesn't reference new water and wastewater infrastructure and are keen to highlight to you the conditions recommended in our application responses. These issues should be considered holistically and we feel the IDS is a good opportunity to mirror the intentions of our recommended conditions.

**Masterplan January 2020 Response** Thank you for seeking the views of United Utilities as part of the consultation process for the Masterplan, Design Code and Infrastructure Delivery Schedule for the above scheme. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

We set out below our comments as part of the consultation for the masterplan for The Lanes. In addition, we also provide comments in relation to the Design Code and Infrastructure Delivery Schedule.

#### **General Comments**

United Utilities wishes to highlight that we will seek to work closely with the Council and landowner during the masterplanning process to develop a coordinated approach towards the delivery of The Lanes development. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions. Should the landowner/developer wish to communicate with United Utilities' assets United Utilities offers a **free pre-application service** for applicants to discuss and agree drainage strategies and water supply requirements. **We cannot**

**stress highly enough the importance of developers contacting us as early as possible.**

Enquiries are encouraged by contacting:

Developer Services – Wastewater

Tel: 03456 723 723

Email: [WastewaterDeveloperServices@uuplc.co.uk](mailto:WastewaterDeveloperServices@uuplc.co.uk)

Website: <http://www.unitedutilities.com/builder-developer-planning.aspx>

Developer Services – Water

Tel: 0345 072 6067

Email: [DeveloperServicesWater@uuplc.co.uk](mailto:DeveloperServicesWater@uuplc.co.uk)

Website: <http://www.unitedutilities.com/newwatersupply.aspx>

### **United Utilities' Property, Assets and Infrastructure**

Water mains are located within the vicinity of the site. As we need unrestricted access for operating and maintaining these assets, we will not permit development over or in close proximity to the main. We require an access strip as detailed in our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which is enclosed.

Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.

For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water assets – [DeveloperServicesWater@uuplc.co.uk](mailto:DeveloperServicesWater@uuplc.co.uk)

Wastewater assets – [WastewaterDeveloperServices@uuplc.co.uk](mailto:WastewaterDeveloperServices@uuplc.co.uk)

**It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.**

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities please visit the Property Searches website; <https://www.unitedutilities.com/property-searches/>

You can also view the plans for free. To make an appointment to view our sewer records at your local authority please contact them direct, alternatively if you wish to view the water and the sewer records at our Lingley Mere offices based in Warrington please ring 0370 751 0101 to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction please contact a Building Control Body to discuss the matter further.

Should a planning application relating to this masterplan be approved the applicant should contact United Utilities regarding a potential water supply or connection to public sewers. Additional information is available on our website <http://www.unitedutilities.com/builders-developers.aspx>

## **Specific Comments The Masterplan**

### **Surface Water Drainage**

United Utilities welcomes the consideration given to the management of flood risk and surface water within the masterplan document. Considering these matters at the outset, and identifying a site wide strategy, will ensure that the development is brought forward in a sustainable manner and can respond to matters and changing circumstances caused by climate change. We would encourage the applicant/landowner to prepare a site wide sustainable drainage strategy for foul and surface water for the entirety of the scheme, taking account of the phased nature of delivery and how each phase will interact with each other. This strategy should clarify that all surface water will be discharged to one of the surrounding water courses, and no surface water will discharge to the public sewerage system either directly or indirectly. If planning permission is granted for the current outline planning application (reference: 07/2020/00015/ORM) we have suggested a condition is attached to the planning permission requesting that a site wide sustainable foul and surface water drainage strategy is submitted for approval. This strategy will set out the overall vision for the site in terms of drainage and each subsequent phase or Reserved Matters application will need to be in accordance with the site wide strategy.

United Utilities welcomes the inclusion of a preliminary drainage strategy within the masterplan document. The statement that surface water runoff from the site will be restricted with discharge to Mill Brook either directly or indirectly through the existing watercourses within the site or the culverted tributary to the north is supported, albeit we require further clarification on this.

Furthermore, we require confirmation that no surface water will drain into the public sewerage system either directly or indirectly. The drainage scheme for this site must be designed in accordance with the wider drainage discussions which have been held to date. This includes discharging surface water to Mill Brook in the west and foul water flows to the 675mm diameter public combined sewer on Pope Lane as outlined within drainage plans submitted as part of planning application 07/2020/00014/FUL for the construction of the Link Road.

Given the various sustainable options available in relation to the drainage hierarchy for the discharge of surface water, the expectation will be that no surface water will discharge to the public sewer either directly or indirectly and we would welcome wording to this effect within the masterplan. The masterplan should clearly set out the need to follow the hierarchy of drainage options for surface water in the NPPG which identifies the public sewer as the least preferable option for the discharge of surface water. The masterplan states that based on anticipated ground conditions and the potential for shallow groundwater, infiltration is not considered to be a suitable method of surface water disposal. We would welcome some further information regarding this as part of the site wide drainage strategy and prior to the detailed design stage.

United Utilities cannot emphasise highly enough the importance of including sustainable drainage systems and applying the surface water hierarchy for the discharge of surface water in a rigorous and consistent manner, especially in an era when the impacts of climate change are ever more present. This supports our recommendation to include sustainable drainage throughout the masterplan to ensure the applicant/landowner is addressing such concerns in future planning applications.

### **Sustainable Drainage and Green Infrastructure**

We welcome the consideration that has been given to surface water drainage and the inclusion of swales across the site. We support the inclusion of Sustainable Drainage Systems (SuDS) and we would welcome the development of a SuDS strategy. We encourage the applicant to prepare a SuDS strategy in tandem with the site wide drainage strategy to ensure they are intrinsically linked through the detailed design process and to ensure that a site wide vision is achieved. Furthermore, the masterplan references that greenspaces could also naturally align with the sustainable drainage vision for the site, to create the opportunity for the delivery of ecological features including swales, wetlands and ponds. We welcome the consideration of how green and blue corridors can ensure a fully integrated SuDS solution is achieved to provide multifunctional benefits as part of a high quality green and blue water environment. The detailed design stage should consider the topography of the site to understand any naturally occurring flow paths and any low lying areas within the proposal where water will naturally accumulate.

Sustainable surface water management should be used to support other principles and requirements of the masterplan, such as sustainable design and public realm improvements. There are opportunities to reduce the surface water run-off as part of the on-site public realm and

landscaping proposals. The masterplan states that surface water runoff from the site will be restricted with discharge to Mill Brook either directly or indirectly through the existing watercourses within the site or the culverted tributary to the north. The masterplan proceeds to state that restricted rates, attenuation volumes and points of connection will be proposed once the Masterplan has been developed further. We welcome further information to this effect and a site wide strategy that ensures all surface water is discharged into the surrounding watercourses and no surface water is discharged to the public sewer either directly or indirectly. For the avoidance of doubt, the expectation will be that only foul flows will communicate with the public sewer.

We cannot stress enough the contribution that the design and landscaping of a site can make to reducing surface water discharge. We welcome the references to surface water management within the masterplan and how this can be linked to the wider landscape, ecology and biodiversity strategies for the site.

We look forward to seeing further information regarding how the scheme will incorporate genuine, above ground, sustainable drainage systems, landscaping features and permeable/porous hard surfacing materials to help reduce or maintain rates of surface water runoff. Consideration should also be given to how the delivery of water and waste water infrastructure can be incorporated into the wider infrastructure provision for the site to promote sustainable development and ensure efficiencies in delivery.

### **Management of Sustainable Drainage Systems**

With regard to the provision of SuDS, we would also recommend a site wide management and maintenance plan for the lifetime of the development. This will ensure the continued effectiveness of the on-site systems through a thorough management and maintenance regime to prevent the systems not functioning properly, thereby undermining the site wide drainage strategy and increasing the risk of surface water flooding.

### **Foul Water Strategy**

The masterplan document does not make reference to an indicative foul water strategy however, information has been submitted as part of the Link Road Application (reference: 07/2020/00014/FUL) and the Outline application (reference: 07/2020/00015/ORM). Any drainage proposals for the site must be designed in accordance with the wider drainage discussions which have been held to date. This includes discharging surface water to Mill Brook in the west, as set out above, and foul water flows to the 675mm diameter public combined sewer on Pope Lane. This is outlined within drainage plans submitted as part of the Link Road planning application (ref: 07/2020/00014/FUL) and reflects the discussions which have been held with us to date.

Given the size of the masterplan site and the information provided regarding the phased delivery of the scheme, the site infrastructure will therefore also be delivered in phases. Due to the phased delivery of the on-site foul water system, it is imperative that a site-wide sustainable foul and surface water drainage strategy is prepared to cover the whole site. The site wide strategy will need to be upheld through the phased delivery of the scheme and the delivery of each phase will need to be fully compliant with that strategy. We understand that foul pumping will be necessary and as per the discussions held to date with the applicant we request that the number of foul pumping stations are minimised to provide a single pumping station. In accordance with the comments we have submitted in relation to the current Outline application for mixed use development, we require further information regarding any temporary drainage measures during construction. For clarification, the expectation will be for only foul flows to communicate with the public sewer.

As set out above we strongly recommend that the applicant/landowner continues to utilise our free pre-application service to discuss and agree drainage strategies and water supply requirements.

**We cannot stress highly enough the importance of developers contacting us as early as possible.**

### **Large Sites with Phased Delivery**

The experience of United Utilities is that where sites are brought forward in phases, and with multiple landowners, achievement of sustainable development can be compromised particularly when a site wide infrastructure strategy, including foul and surface water drainage, is not considered at the outset. This can result in interconnecting phases of development being brought forward in a piecemeal manner, with the interaction of phases not fully considered, undermining the broader infrastructure strategy for the site.

Any drainage as part of early phases of the development should have regard to future interconnecting development phases, ensuring unfettered access between the various parcels, preventing a piecemeal approach to drainage and demonstrating how the site delivers sustainable drainage as part of the interconnecting phases. The aim is to ensure the drainage and design principles set out within the masterplan are met through each development phase, irrespective of the timing of its delivery or the ownership status of the land.

We would encourage a pro-active approach to sustainable drainage to ensure communication between phases so there is sufficient capacity to serve all the development sustainably in the development area and not just one phase. We believe that raising this point at this early stage in the preparation and evolution of the masterplan is in the best interest of delivering this scheme in the most sustainable and co-ordinated manner. Furthermore, a site wide sustainable drainage strategy will ensure that the delivery of the overall scheme is fully coordinated, notwithstanding multiple ownerships and phases.

### **Water Efficiency**

Maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. There is likely to be greater demand from customers for environmental improvements which in turn may be reflected in increased environmental standards over time. Consequently, development will need to enhance the environmental quality of the immediate area and manage the effects of climate change. United Utilities encourages the use of systems such as rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Benefits include a reduction in environmental impact through the efficient use of valuable resources and a reduction in the costs associated with improving local water infrastructure for new development as they require less mains water. An additional benefit is the reduction in future occupants' costs for both water bills and energy bills (through heating water).

### **Design Code**

With regard to the Green Movement and Spaces section of the Design Code we welcome the consideration of how the sustainable drainage network can be interlinked with the wider landscape proposals for the site. The consideration of ecological features such as swales, wetlands and ponds to deliver the sustainable drainage vision for the site, and the proposals for the site's greenspaces, will ensure multifunctional benefits can be achieved. We welcome the consideration of how green and blue corridors can ensure a fully integrated SuDS solution is achieved, providing multifunctional benefits as part of a high quality green and blue water environment.

We support the consideration of swales along the route of the CBLR corridor to provide surface water drainage and attenuation and the proposal to incorporate these swales into the surrounding land uses. Given the proposed location of the swales adjacent to the highway, debris can collect within them, preventing the system from functioning properly. We therefore request that a thorough management and maintenance regime is imposed to ensure the continued efficient use of these swales, to prevent the systems not functioning properly and thereby undermining the site wide drainage strategy which in turn will increase the risk of surface water flooding.

### **Infrastructure Delivery Schedule**

The Infrastructure Delivery Schedule (IDS) does not specifically relate to the delivery of water and wastewater infrastructure. As set out above and reiterated in our response to the current outline planning application for the site (reference: 07/2020/00015/ORM) we would welcome a holistic, site wide sustainable drainage strategy. This will ensure that the phasing set out within the IDS is achievable and a clear drainage strategy is in place from the outset. Where possible, the delivery of water and wastewater infrastructure should be considered alongside the broader infrastructure for the site to ensure efficiencies in design and to maximise opportunities for sustainable development. United Utilities will continue to work with the Council and the developers/landowners to identify any infrastructure issues and appropriate solutions.

### **Summary**

Thank you for providing United Utilities with the opportunity to comment on this masterplan document. Moving forward, we respectfully request that South Ribble Borough Council continues to consult with United Utilities for all future planning documents. We are keen to continue working with the Council to ensure that all new growth can be delivered sustainably and are happy to discuss the content of this letter further.



**Education** – confirm that the response of the School Planning Team below should be viewed as additional to the response provided in February 2020 and not a replacement of that response.

The School Planning Team wish to add comment on the following matters.

## **School Site**

### **1: Site size**

The size of the site is 15,954m<sup>2</sup>. Department for Education guidance in Building Bulletin 103 is that a site for a 2 Form Entry primary school should be between 15,986m<sup>2</sup> minimum and 20,040m<sup>2</sup> maximum. The site is therefore below the minimum required and, due to the constraints of the site noted below, the site is required towards the top of this range rather than the bottom.

Whilst most of the site boundaries are fixed by roads, the existing gas main or natural features there is an area to the south of the marked boundary that could be incorporated into it which is currently shown for housing. The inclusion of the area south of the red line boundary, i.e. land between the existing properties 'Hawthorn' and 'Thornlea', and up to the boundary with Bee Lane, is required for the school site. The addition of this area of land would help to mitigate the constraints on the width of the site North to South due to the existing high pressure gas main and the flood mitigation measures proposed.

Any raising of levels on the school site to address flooding cannot be within the gas easement. The raising of levels would have to be incorporated within the school boundary. This could potentially mean a 200m strip of land running along the north of the site will have to accommodate a change of level and depending on the height, could render a strip of land several metres wide unusable for siting playing surfaces. A boundary onto Bee Lane may also benefit the layout of the school grounds and provide potential for a pedestrian entrance.

### **2. Services Easements**

There are a number of easements to services which will constrain the site development. There is an 8m easement required to the foul and surface water drainage proposed along the northern site boundary, as well as a 6m easement for the gas main and watercourse maintenance to the Eastern boundary. Although these are not expected to unduly impact on the position of a new school building, they will constrain the layout of the grounds to some extent, hence the request for additional site area to the south.

### **3. Levels and surface water drainage**

The proposed school site is very wet with virtually the whole area being classed as susceptible to surface water flooding. The developer is proposing to manage existing surface water flooding by creating a flood storage area along the north boundary of the overall development. The school site currently drains into existing ditches therefore a new site drainage system would have to be introduced, connected to the new/ existing infrastructure. Maintenance of this new drainage system should not be the responsibility of the school.

The Proposed School Site Statement document by Lees Roxburgh Consulting Engineers indicates the design of the flood storage area is currently being progressed with development levels to be set at a minimum of 27.6m. The existing levels of the school site are currently unknown but the Ordnance Survey shows levels of 27.4m at the junction of Bee Lane and Moss Lane with a level of 27.7m on Bee Lane to the south of the school site, as shown on the attached plan 10899-A10-Existing Constraints Plan, attached to this response. The overall site looks relatively flat but the drainage does all run north which would suggest the site falls in this direction. It would therefore be reasonable to assume the school site is lower than 27.6m and would have to be raised to address flood risk.

This will add a further constraint to the position of pitches or hard courts towards the northern boundary as the site will then need to slope down towards the area of the easement (which we will not be able to raise). The site will required to be raised to make it acceptable due to the drainage issues mentioned.

### **4. Site shape and layout**

We are happy that the vehicular site access proposed should work so long as the proposed parking area is developed as shown in the constraints plan attached. This should take

pressure off the school parking area. If the site boundary to the south can be moved and levels raised, as above, we would conclude that this is an acceptable site.

### **Finance**

There remains uncertainty regarding how the mitigation of the strategic development impact on school places is being funded. The latest Masterplan and IDS now notes that school places will be funded through CIL, with the site to be secured through a Section 106 agreement. Given the other infrastructure listed as utilising CIL, funding may not be available to address the impact of this development and a Section 106 contribution should be sought for both the provision of the school site and the cost per place contributions that are required to meet construction costs. LCC have written to South Ribble Borough Council on 21<sup>st</sup> August 2020 seeking clarification of the funding arrangements for this site. The detail in the response from South Ribble provided on the 1<sup>st</sup> September 2020 indicates that both the school places and the site should be funded from CIL.

With no clarity on the final position but with the three differing views, noted above, suggested for how the Masterplan development will fund its impact on school places, this leads to great uncertainty over whether a school is deliverable, leading to questions over the site's sustainability.

Therefore, as part of this Masterplan adoption process all parties should be in a position to agree the funding arrangements for the provision of a new school, so that there is no uncertainty when decisions are made on the applications. We would ask that this Masterplan is not adopted until there is an agreed position on the funding arrangements for the new school. If not, the Masterplan is not deliverable.

We have been informed by South Ribble that the applications will need to be revised to accord with the Masterplan and so a round of re-consultation will be required once those amendments are made. Can you please inform the School Planning Team

(schools.planning@lancashire.gov.uk) a month prior to committee so that we can provide our final assessment of development impact on school places and our views on the development sustainability? If the funding position is still uncertain at this point then this raises sustainability questions on the development and potential for objection.

It should be noted that it was always understood by all parties that the first application within the strategic site would take up any remaining surplus primary school places within the catchment of the development and the requirement for a new school would result from the significant shortfall created by subsequent Masterplan applications. This school site was sought as part of application 07/2020/00015/ORM in agreement with South Ribble. Please can we seek clarification on whether South Ribble are requesting that Taylor Wimpey (1,100 dwelling application) meet the full cost implications of providing the school site or are they intending to implement equalisation arrangements, where applicants from the remainder of the Lanes Masterplan site are required to contribute towards the cost of the land? Again, this requires clarification, as the latest South Ribble position provided to us on the 1<sup>st</sup> September 2020 indicates that the school site costs should be funded through CIL.

Again, may we take this opportunity to remind you of the DfE 'Securing Developer Contributions for Education' guidance that states that there should be an initial assumption that both land and funding for construction will be provided for new schools planned within housing developments, with the land provided on a peppercorn basis.

In conclusion, The School Planning Team would like to thank South Ribble Borough Council for the opportunity to respond to the latest consultation. We look forward to receiving your views on the matters raised in this letter prior to a decision being taken on this Masterplan.

**'PENCON', The Penwortham Nature Conservation Group** - are utterly dismayed at the plans to build on the sites at Pickering's Farm and Chain House Lane.

Surely, if the plans are passed it is only to appease the builders, to keep them in business. once this land is built on, it is built on forever, no going back.

People who already live close to the designated sites most likely bought their properties for the clean air, quietness, open spaces and the fact that they never wished to live in noisy, built-up areas.

When these open, green areas are built on, everything changes- noise, pollution, traffic and total frustration at the way of life existing residents must accept.

If any of the town planners, councillors, and anyone else who is guilty of letting these plans be passed had to travel in the area at ANY TIME, not just peak times they would realise the roads just can't cope with the amount of traffic on the roads around Lostock Hall. It is gridlocked in the morning 'rush hour' and again in the evening.

Adding more houses is just not acceptable, as every new property will also have at least one car, possibly two or three. This just has to stop somewhere!!!!!!

As a great lover of nature, and if I may say, a well-known published wildlife photographer it saddens me greatly to see our fantastic countryside destroyed, permanently, for the greed of a few.

I have photographed and studied the wildlife in and around both these sites over many years, and know for a fact that we have breeding barn owls, little owls, skylark, foxes and many smaller animals like voles, shrews and field mice that rely on these areas to survive, all species that are becoming increasingly scarce or rare due directly to the greed of property developers.

People like us just don't want to live in increasingly built up areas, surely, by keep 'adding on' to existing small towns and villages the planners only add to the existing congestion with which we are already struggling to cope with, The infrastructure around Lostock hall and Lower Penwortham is already at saturation point.

Please don't add to it. We don't want to become another Manchester or Birmingham!!!!!!!!!!