



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Alan Shepherd – Divisional Director
Network Delivery and Development
North West Region
Highways England
planningNW@highwaysengland.co.uk

To: Fylde Borough Council

CC: transportplanning@dft.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: 21/0480

Referring to the notification of a planning consultation dated 25th May 2021 for the phased redevelopment of a part of a chalet site to a holiday park including removal of existing lodges / chalets / buildings and construction of 35 bases for static caravan use as a holiday park open all year on land at Riverside Chalet Park, Occupation Lane, Singleton, Lancashire FY6 7RA, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.¹

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dft.gov.uk.

Signature: *Warren Hilton*

Date: 26th May 2021

Name: Warren Hilton

Position: Assistant Spatial Planner

Highways England:

8th Floor, Piccadilly Gate, Store Street, Manchester M1 2WD

¹ Where relevant, further information will be provided within Annex A.

Annex A ~~Highways England recommended Planning Conditions /~~
~~Highways England recommended further assessment required /~~
~~Highways England recommended Refusal.~~

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

There have been no pre-application discussions prior to submission of these proposals. This application is effectively a resubmission of a previous 2020 application (ref. 20/0542) that has been refused permission.

Highways England Comments and Formal Recommendation

The current usage of the site does not enjoy planning consent and we understand that this application is to formalise this.

Access to the site is via Occupation Lane, which is a local side road access from the A585 trunk road approximately 75 metres from the centre point of the nearby Little Singleton junction. The A585 is single carriageway in either direction separated by central reserve markings and right-turning pocket. The road has a 40mph speed limit.

The junction of Occupation Lane with the A585 is substandard and does not reflect current design standards set out within CD123 of the Design Manual for Roads and Bridges. Occupation Lane is narrow; width estimated to be less than the standard 4 metres required, which creates the potential for conflicting movements between vehicles seeking to exit and enter Occupation Lane at the same time. This may lead to abortive turning movements into Occupation Lane from the trunk road that creates a risk of shunt-type accidents occurring. A right turn ‘pocket’ refuge for vehicles exists on the trunk road opposite Occupation Lane, which is intended for use by vehicles seeking to enter the fuel filling station opposite, but may equally be used by vehicles wishing to turn right from the trunk road into Occupation Lane – again, conflicts due to opposing turning movements may occur if two opposing vehicles wish to run right at this point at the same time.

Whilst the current site does not appear to have planning approval (this is a matter for the LPA) it has operated for many years. In seeking planning approval, what is of relevance is whether this will lead to a material increase in usage of the existing substandard junction access with the trunk road – the inherent risks associated with the existing use of the site and the road junction with the A585 are now a given and

would be the case whether the proposed development was approved or not and so act as a benchmark. There is no requirement to bring junctions such as that with Occupation Lane up to current design standards retrospectively. Any requirement to upgrade the junction to current standards would be dictated by the traffic impact that a development proposal had. Consequently, what matters is whether the proposals in this planning application would significantly intensify the number of traffic movements at the junction to the extent that there would be a material detriment to safety. This is because, on any highway, every vehicle turning movement presents a risk of an accident occurring.

Highways England has therefore previously requested that the applicant undertake a traffic survey of the junction and an analysis of the accident record at that location for the last five years to establish:

- The number of vehicle movements generated by the existing 35 residential chalet units that it is proposed would be replaced with the 35 static caravans.
- The total number of vehicle movements into and out of Occupation Lane at its junction with the A585 and which direction those vehicles turned from and to at the junction (this is that generated by all of the properties accessed by Occupation lane, not just this portion of the Riverside Chalet Park).
- Examine accident records for the most recent five-year period at the junction to establish the number of accidents occurring at the Occupation Lane junction with the A585 and what the causes were.

The applicant subsequently appointed SCP Transport to undertake this exercise and has produced a technical note reference MC/200717/TN01 dated 30 November 2020, and which forms the basis of the transport assessment of this application.

Highways England comments on SCP Transport Technical Note

The analysis within the technical note seeks to establish the existing number of vehicle movements associated with the existing 35 chalets and then use an accepted, industry-standard tool, the Trip Rate Information Computer System (TRICS) database to predict the number of trips that 35 static holiday caravans could be expected to generate - TRICS is a database based on actual surveys of a variety of land uses in the UK and Republic of Ireland.

SCP Transport conducted their traffic survey over a 12-hour (7am-7pm) period on three consecutive days (Thursday, Friday and Saturday), which is accepted by us.

We have also considered the approach taken by SCP Transport to generating the number of trips that 35 static holiday caravans could be expected to develop and can confirm that their overall approach is reasonable and therefore accepted by us.

The numbers of trips recorded during the traffic count survey by the existing 35 chalets at the Occupation Lane junction is set out on Table 1 of the technical note and is copied below. It shows the numbers of trips generated during the typical morning and evening peak periods for the A585 Mains Lane (Saturday is excepted, as at weekends the typical weekday peaks are not in evidence) as well as the total number of trips associated with the chalets each day (7am-7pm).

Table 1 – Existing Trip Generation

Date	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 to 18:00)		Daily	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Thursday	1	2	1	4	34	32
Friday	4	3	7	1	49	40
Saturday	2	1	2	2	35	42

This shows daily averages of 39 arrival movements and 38 departure vehicle movements over the survey period.

Below, the table taken from TRICS provides a comparison for the number of trips that could be expected to be generated by 35 static holiday caravans. In comparison, this would result in an average of 41 daily arrival movements through the junction and average of 39 departure movements through the junction.

Table 3 – (35 Static Caravans) Vehicle Trip Generation

Date	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 to 18:00)		Daily	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Thursday Trip	1	1	5	2	38	33
Friday Trip	1	1	6	3	41	45
Saturday Trip	1	1	4	4	43	39

Table 4 of the technical note provides a direct comparison of the peak hour and daily figures between the existing site and an equivalent 35-unit static caravan development, with further analysis in paragraphs 10 to 12.

Highways England has already considered this evidence, which shows that the impact the development would be likely to have on the number of vehicle movements at Occupation Lane junction (and hence risks of an accident occurring) would be insignificant; resulting in the extremes of a maximum net difference of only 8 less movements and 8 more movements compared with now (Friday and Saturday respectively). **The level of difference is therefore likely to be imperceptible, and so there is no evidence that the proposed development would have any material impact upon the existing levels of safety risk at the junction.**

Appendix B of the technical note contains the full results of the survey recording all vehicle movements at the junction during the survey period and serves to demonstrate that the existing 35 chalets generate only a small proportion of all vehicles using the junction as a whole, which places the impact of both the existing chalet park and proposed caravan development traffic in proportion.

In terms of the existing safety record for the junction, SCP Transport claim that no incidents have occurred at the A585 / Occupation Lane junction during the last five full calendar years (2015-19). It should be noted that the recognised source of the information (www.crashmap.co.uk) that has been used indicates several markers for incidents that have occurred in the vicinity of the Occupation Lane junction. We have analysed these incidents and come to the conclusion that one incident did occur on the A585 in the vicinity of Occupation Lane junction on 8th November 2017, but we believe that this did not involve a vehicle attempting to enter or exit Occupation Lane.

SCP conclude that *“the proposed redevelopment of the site would not result in a material intensification of traffic at the junction, where there is no recent record of safety concerns”*. We would agree that the accident record for this junction does not support a view that the junction already has a poor safety record or that the traffic impact of the development would be likely to change that situation.

Whilst the standard of the Occupation Lane junction is not ideal, it should also be noted that the section of the A585 that it is located on (Mains Lane) will be bypassed to trunk road traffic when the A585 Windy Harbour to Skippool Bypass (currently under construction) opens to traffic in 2023. Following this, Mains Lane will be detrunked and become a local road under the responsibility of Lancashire County Council. Traffic modelling undertaken by Highways England as part of the Bypass scheme projects that traffic flows on Mains Lane will fall significantly when the Bypass becomes operational and that traffic queues on the eastbound approach to the Little Singleton junction will also reduce and will not interfere with the operation of the Occupation Lane junction.

Finally, it should be noted that any matters or concerns relating to Occupation Lane itself are matters for Lancashire County Council to comment on as highway authority for this road.

Highways England Conclusion and formal recommendation

Highways England has considered the evidence presented to us by the applicant, and our conclusion is that this proposed development would not be expected to result in any material intensification of the use of the site (and therefore the A585 / Occupation Lane junction)

The overall approach is reasonable. There are a limited number of comparable sites to this contained in the TRICS database (most are much larger sites), but SCP has used average trip rates from the available sites in order to calculate the trip generation for the proposed use, and compared this to the trips generated by the current use (recorded through traffic surveys of the Occupation Lane junction). This results in a net difference of between 8 less and 8 more movements, which is immaterial when considering the inherent imprecision when using average trip rates. From the information provided, there is no indication that the proposals would result in any material intensification of the site. We are therefore satisfied that the development would not have a severe traffic impact or have a material detrimental impact upon safety, which are the criteria set out in the governing DfT Policy Circular 02/2013 'The Strategic Road Network and the delivery of Sustainable Development'. Consequently, Highways England has no objection to this application.

This response represents our formal recommendations with regard to this application and has been prepared by Warren Hilton.