

**Town and Country Planning Act 1990 (As Amended)**

**Burnley Borough Council**

**Planning Application Reference : FUL/2019/0315**

**Erection of 130 no. dwellings with associated access roads, open space and landscaping and vehicular access from Standen Hall Drive following the demolition of no. 64 Standen Hall Drive**

**Land to the north of Saxifield Street,**

**Review of the Highway & Transport Impacts  
of the Proposed Development for the Standen Hall Drive Residents Group**

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## **1. Introduction**

- 1.1 This report has been prepared on behalf of a local residents group in the Standen Hall Drive area of Burnley to review the highway and transport impacts of the proposed development that has been submitted with Burnley Borough Council planning application FUL/2019/0315.
- 1.2 The planning application seeks full planning permission for the erection of 130 no. dwellings (now reduced to 120 no. during the consultation for the planning application), together with associated landscaping and vehicular access from Standen Hall Drive.
- 1.3 The report has been prepared by Mr J Carruthers who is a highway and transport consultant with over 34 years of relevant professional experience in the public and private sectors. During the preparation of the report the following investigations have been undertaken :
  - an examination of the planning application submission including the Transport Assessment and the Travel Plan,
  - an examination of the consultation response to the planning application by Lancashire County Council (Highways),
  - an examination of the existing highway network and the transport infrastructure and services at different times of the day and week,
  - a meeting with the local residents group who are concerned about the potential adverse impacts of the proposed development on the operation, and safety, of the highway network, including the potential impact on air quality, and,
  - consideration of the proposal in relation to national and local highway and transport policies including the National Planning Policy Framework (NPPF), and the Burnley Local Plan (2012-2032).
- 1.4 The report describes the investigations that have been undertaken and identifies a number of significant and unacceptable highway and transport impacts that would arise from the proposed development.

## **2. Review of the Highway & Transport Impacts of the Proposed Development**

2.1 The Transport Assessment (TA), that has been submitted with the planning application has been reviewed and a number of significant issues have been identified that would affect the predicted operation, and safety, of the highway network.

### Scope of Highway Study

2.2 The TA examines the traffic operation of 3 existing junctions on the highway network, as follows :

- Junction of Standen Hall Drive / Hillingdon Road,
- Junction of Standen Hall Drive / Briercliffe Road (mini-roundabout),
- Junction of Hillingdon Road North / Marsden Road.

2.3 The TA states that the extent of the highway network to be examined is based on previous historical traffic studies for developments at the site. There is no reference, or consideration, of the serious traffic congestion problems that occur on the highway network that would be affected by traffic generation from the proposed development at the following locations :

- Junction of Briercliffe Road / Casterton Avenue (roundabout)
- Junction of Briercliffe Road (leading to Marsden Road) / Briercliffe Road, and
- Junction of Briercliffe Road / Halifax Road (traffic signals)

2.4 Observations have been carried out at these junctions during the weekday peak periods and show that there is severe traffic congestion at these junctions resulting in long traffic queues with high levels of vehicle emissions. The addition of development traffic at these locations would exacerbate existing traffic congestion and the associated air pollution. It is known that when a highway network operates at, or close to, its capacity minor increases in traffic volume create a disproportionately high increase in congestion and associated air pollution. The occurrence of severe traffic congestion and poor air quality at these locations also serves to discourage active travel (walking and cycling), and also affects the reliability of public transport services.

- 2.5 The additional development traffic at these congested junctions would increase the frequency, and duration, of traffic queues and air pollution in the vicinity of local schools, such as Burnley St. James' Lanehead Primary School, Burnley General Hospital and residential properties. **Policy IC2 of the Burnley Local Plan** requires the TA to assess the impact of the development on air quality for residential developments of more than 80 dwellings. This has not been carried out.
- 2.6 In February this year, the National Institute for Health and Care Excellence (NICE), published a Quality Standard that covers road traffic related air pollution and its impact on health. Statement 2 of the standard requires local planning authorities to assess proposals to mitigate road traffic related air pollution in planning applications for major developments. The standard states that the proposals to mitigate road traffic related air pollution must be evidence based. The potential adverse health impacts that would arise from additional traffic from the proposed development at the locations referred to above has not been considered, or mitigated, in the planning application.
- 2.7 Therefore, the highway network that has been examined in the TA is not considered to be satisfactory and the cumulative impact of the development traffic at existing severely congested locations would exacerbate existing traffic congestion and air pollution. The Burnley Local Plan identifies peak hour traffic congestion on the borough's roads as one its main challenges (**Section 2.8 of the Local Plan**), and **Section 5.5.53 of the Local Plan** states that 'wherever possible, all forms of pollution are considered, controlled and mitigated against as part of the development process'.



Weekday morning peak traffic congestion on Briercliffe Road that has not been considered in the Transport Assessment

### Traffic Analysis

- 2.8 The traffic analysis that has been carried out in the TA for the 3 junctions referred to in paragraph 2.2, above, does not take account of the traffic increase that will occur as a result of other developments in the Briercliffe area. This means that the highway network will be more congested than the traffic analysis in the TA. These developments are as follows :
- Proposed residential development at Talbot Street, Briercliffe,
  - Proposed residential development at Jubilee Street, Briercliffe,
  - Proposed residential development at Maytree Close, Briercliffe
- 2.9 The traffic analysis that has been carried out in the TA uses average rates of traffic generation for the proposed development. Because the operation of the highway network is at, or close to, its design capacity a sensitivity check should be carried out to assess if the highway network could accommodate the proposed development traffic if the traffic generation rates are higher than average (using an 85<sup>th</sup> percentile level of traffic generations as recommended for a sensitivity check). The traffic distribution estimates should also be checked to ensure a robust traffic assessment at each junction on the highway network.
- 2.10 The traffic models that have been used to predict how the junctions will work with the extra development traffic have not been checked (calibrated), to show that they are reliable by modelling existing traffic conditions. It is normal good practice to use the traffic models to check that existing traffic queues and delays are accurately predicted before testing the traffic models with the development traffic. The traffic surveys that have been carried out for the TA did not include traffic queue lengths at the junctions so it is not possible to check that the traffic modelling is accurate. There has also been no independent traffic modelling carried out by Lancashire County Council to ensure that the information that has been submitted with the planning application is robust for this major development.

- 2.11 The traffic capacity figures that are shown in the TA for the existing roads are considered to be significant over-estimates because they do not take account of existing on-street parking and single track operation of the roads at certain times e.g. along Hillingdon Road and Hillingdon Road North.
- 2.12 Therefore, the traffic modelling that has been submitted in the TA is not considered to be reliable or robust for the forecast design year of 2024 when the proposed development will increase traffic on the highway network. This will result in higher levels of traffic delay and air pollution than has been predicted in the TA as a result of the proposed development.

Proposed Traffic Calming Measures on Standen Hall Drive

- 2.13 Road humps and raised junction platforms are proposed by the developer along Standen Hall Drive from its junction with Hillingdon Road to the proposed site access. These measures, coupled with the predicted increase in traffic levels from the proposed development and the on-street parking along this section of Standen Hall Drive, will result in an increase in traffic related air pollution. The proposed development of 120 houses will result in an additional 800 vehicle movements per day (minimum), using this section of Standen Hall Drive based on a typical traffic generation rate of 3.5 vehicle trips per day per dwelling.

Therefore, the traffic that will be generated by the proposed development and the proposed highway layout will result in a significant deterioration in the air quality for local residents along Standen Hall Drive.

Design of Site Access from Standen Hall Drive

- 2.14 It is understood that there has been no consultation with existing residents who live off Standen Hall Drive about the proposed highway access layout for the proposed residential development and the vehicular access requirements for these properties. The proposed highway layout would adversely affect the vehicle access to the properties that are served from the existing access road. Lancashire County Council have stated that the proposed access layout will be further scrutinised as part of the detailed design phase but the highway proposals should already be finalised as part of this detailed planning application. The lack of consultation with local residents about the proposed development layout does not comply with the guidance in the Manual for Streets in relation to the need for Quality Auditing for new developments.
- 2.15 Therefore, the detailed highway design of the residential site access has not been satisfactorily completed for the planning application.

Inclusive Mobility

- 2.16 **Policy IC1 of the Burnley Local Plan** states the following in relation to the requirements for safe and convenient access at new developments :

*Development schemes should ensure convenient and inclusive accessibility to all sections of the community to, from and within developments*

- 2.17 The proposed development scheme cannot be considered to have convenient and inclusive accessibility for all sections of the community. The proposed development is located on a steeply sloping site with access via existing roads with long, steep, gradients. These access roads that serve the proposed development from the bus stops and local services (Saxifield Street and Standen Hall Drive), also have pavement parking which would obstruct a wheelchair user at certain locations. The condition of the existing footways that serve the site have broken paving and no dropped kerbs at junctions. Whilst these are existing problems, the existing transport infrastructure is not suitable for access by all sections of the community and there are no proposals to address these problems in the planning application. The distance to the nearest bus stops from the proposed development would also not be convenient for many residents.



Pavement parking on the roads serving the site obstructs the footway for pedestrians and wheelchair users

- 2.18 The detailed design of the proposed internal highway layout and footways have not been included with the planning application so it is not possible to establish the gradients and whether they would comply with the recommendations for inclusive mobility. The planning application seeks detailed permission for access so this information should have been submitted.
- 2.19 Therefore, the proposed development would not have convenient and inclusive accessibility to all sections of the community and this would make access to bus services and local services difficult for persons with a mobility impairment or other disability.

Diversion of Public Footpath No. 174 within the Proposed Development

- 2.20 The proposed residential development layout shows the existing public footpath from Standen Hall Drive being diverted on an oblique line across the carriageway of the proposed access road and along surfaced footpaths. This will change the character and attractiveness of the public footpath for the existing users who use the footpath for recreational walking. The Ramblers Association and Defra Circular 1/09 recommend that a diverted footpath should avoid the use of estate roads and take a separate route through landscaped or open spaces away from vehicular traffic.
- 2.21 Therefore, the proposed diversion of the existing public footpath within the proposed residential development would change the footpath beyond recognition and this would be detrimental to existing residents and walkers who use this public footpath.

Road Safety

- 2.22 An examination of the road safety information for the local highway network within 800 metres of the proposed development shows that there have been a, relatively, high number of recorded injury accidents during the most recent 5 year data period 2014 – 2018 inclusive, as summarised in Table 1, below :

<b>Section of Road or Junction</b>	<b>No. of recorded injury accidents</b>
Hillingdon Road / Hillingdon Rd. North	4 no. (1 serious)
Junction of Hillingdon Road / Standen Hall Drive	1 no.
Junction of Hillingdon Rd. North / Marsden Road	1 no.
Junction of Standen Hall Drive / Briercliffe Road	1 no.
Briercliffe Road (Standen Hall Drive – Casterton Ave.)	7 no. (1 serious)
Burnley Road (Finsley Street – Townley St.)	2 no.
Briercliffe Road / Casterton Ave. (roundabout)	5 no. (2 serious)
<b>Total</b>	<b>21 no. (4 serious)</b>

Source : [www.crashmap.co.uk](http://www.crashmap.co.uk)

Table 1 : Recorded Injury Accidents on the Local Highway Network  
(within 800 metres of the proposed development)

- 2.23 Table 1 shows that there have been 21 recorded injury accidents on the highway network within 800 metres of the proposed development site including 4 serious accidents. The TA does not examine the details of these accidents or propose any mitigation for the additional traffic movements that will be generated onto this highway network.
- 2.24 Therefore, there is evidence of highway safety problems on the local highway network that would be increased as a result of the traffic generation from this major development.

#### Sustainable Transport and Travel Plan

- 2.25 It is considered that the TA and Travel Plan significantly overestimate the potential for sustainable transport to replace private car trips at the proposed development. The existing pedestrian and cycle infrastructure is of a, relatively, poor standard (as described in the previous sections of the report), and the high levels of traffic and congestion in the local area, including the poor air quality, will discourage active travel for future residents and visitors. The low frequency and limited number of direct destinations that are available using existing bus services along Standen Hall Drive and Briercliffe Road means that the potential number of trips by public transport will also be low. Observations show a very low number of people use the existing bus services in the area.
- 2.26 Therefore, the proposed development will result in a low number of trips by sustainable transport (walking, cycling and public transport), and will have a high level of car dependency. This will undermine the objectives of the Burnley Local Plan and the National Planning Policy Framework to promote sustainable transport.

### **3. Conclusions and Recommendation**

- 3.1 The report reviews the highway and transport impacts that would result from the proposed residential development of 120 dwellings on land off Saxifield Street and Standen Hall Drive in Burnley.
- 3.2 The report shows that the Transport Assessment (TA), that has been submitted with the planning application does not consider the full traffic, road safety and air quality impacts on the highway network within 800 metres of the proposed development site. There are existing severe levels of traffic congestion and traffic related air pollution on the highway network that would be exacerbated by traffic that would be generated by the proposed development. These impacts would undermine the policies in the Burnley Local Plan that relate to reducing traffic congestion and improving air quality in the borough including Local Plan Policy IC2 requiring the investigation of air quality impacts for major developments. The impacts would also exacerbate potential health problems that are related to traffic emissions along Briercliffe Road and Standen Hall Drive and as described in a recent National Health and Clinical Excellence (NICE) Quality Standard report (QS 181).
- 3.3 The report shows that the existing highway and transport infrastructure in the vicinity of the proposed development is poor and there would be a low number of trips by sustainable transport (walking, cycling and public transport). This would result in high levels of car dependency especially for residents and visitors with mobility impairment or a disability and contrary to the Burnley Local Plan policy on inclusive accessibility (Policy IC1).
- 3.4 The report shows that there are a number of detailed design matters that have not been included with the planning application despite the planning application being a full planning application for access. These include the site access layout and the access arrangements for local residents who have not been consulted about their access requirements.

- 3.5 Overall, the highway and transport impacts that would arise from the proposed development, as submitted, are considered to be unacceptable and would not be in accordance with the policies of the Burnley Local Plan and the National Planning Policy Framework (NPPF). It is, therefore, recommended that the planning application should not be approved.