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Your ref: LCC/2023/0030  
Our ref: LCC.D2.2023.0030  
Date: 7<sup>th</sup> October 2025

Dear Sir/Madam

Application no: **LCC/2023/0030**

Address: **Land off Bourbles Lane, Preesall**

Proposal: **The extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to leisure end-uses, agricultural land and biodiversity enhancement, using imported inert fill.**

The Local Highway Authority have viewed the plans and highway related documents and have the following comments to make:

### **Summary**

#### **Objection**

Lancashire County Council acting as the Local Highway Authority are of the opinion that the proposed planning application as presented will have a detrimental impact on highway safety in the vicinity of the site and should be refused on highway safety grounds as detailed within this report.

### **Advice to Local Planning Authority**

#### **Introduction**

The Local Highway Authority (LHA) have been re-consulted on an application for the proposed minerals extraction scheme at the land off Bourbles Lane, Preesall.

The LHA previously formally responded to the application on **14<sup>th</sup> February 2025**, objecting to the application due to the following issues:

1. Access – the access plans fail to demonstrate that adequate sightlines are achievable.
2. Lancaster Road – insufficient evidence has been provided to demonstrate that the carriageway can be widened by an additional 0.3m on both sides.



3. Lancaster Road- two-way articulated movements are not possible as Lancaster Road passes Vine House. This could compromise highway safety as articulated vehicles may need to reverse to allow two-way HGV movements to occur.
4. Proposed mitigation measures along Lancaster Road and the A588- signage schemes have been proposed to mitigate the impacts the proposal will have on the local highway network. The LHA have concerns regarding the signs oversailing or being located within third party land and also question the suitability of this "soft measure" to mitigate against articulated vehicles having to undertake reversing movements on the live network, when two-way movements are not possible.

Since the previous consultation period ended, the following information has been submitted to supplement the updated Transport Statement provided by Turner Lowe Associates dated December 2024. These documents include:

- Letter provided by Napthens Solicitors dated 28th May 2025;
- Response to Highway Authority Consultation Response of 14 February 2025 provided by Turner Lowe Associates dated May 2025;
- Email provided by Turner Lowe dated 28<sup>th</sup> August 2025; and
- Email provided by Ian Baxter dated 5<sup>th</sup> September 2025 which provides links to two videos showing two HGVs using the bend adjacent to Vine House along Lancaster Road, 150m from the site access. In this localised area, the carriageway varies in width between 5.0m - 5.9m within a localised 30m area of the access serving Vine House.

### **Development Proposal**

The proposal is for the exportation of an estimated 460,000 tonnes of sand and gravel and the importation of 220,000m<sup>3</sup> of inert fill materials during the lifespan of the development.

The works will be phased over a 6 year period:

- Phase A – Site Enabling Works (approx. 6 months)
- Phase 1 – North-western area of site (approx. 18 months).
- Phase 2 – North of Bourbles Lane (approx. 6 months)
- Phase 3 – East of Bourbles Lane (approx. 18 months)
- Phase 4 – Central area including duck pen (approx. 12 months)
- Phase 5 –Completion of infilling, processing plant removal and final restoration (approx. 12 months).

To access the site, a new access will be created from Lancaster Road and the implications of this are detailed below.

### **Site Access**

In the previous highway comments dated 14<sup>th</sup> February 2025, the LHA requested that further information was provided regarding:



- An amended vehicular visibility splay drawing demonstrating compliance with the required 2.4m x 58m splays, which are based on the recorded 85th percentile speeds along Lancaster Road.

The Agent has submitted a screenshot within the document titled "Response to Highway Authority Consultation Response of 14 February 2025", indicating that visibility splays of 2.4m x 43m in both directions can be achieved. The document also claims that 2.4m x 58m splays are possible, in line with the recorded 85th percentile speeds. However, the screenshot showing the 43m splays is unscaled, and no formal vehicular visibility splay drawing has been provided to verify that the full 58m splays can be achieved. As such, the matter of vehicular visibility remains unresolved and cannot be positively concluded.

### **Trip Generation**

The updated Transport Statement (TS) has stated on average that a total of 74 development related HGV movements will occur each day, when the site is in operation between Monday - Friday (245 days a year) during its operating hours of 0700-1800.

When the site is in operation on a typical weekday, the TS has assumed the following movements to and from the site each hour:

Time	Site Arrivals	Site Departures
0700-0800	3	3
0800-0900	0	0
0900-1000	5	5
1000-1100	5	5
1100-1200	5	5
1200-1300	5	5
1300-1400	5	5
1400-1500	5	5
1500-1600	0	0
1600-1700	4	4
1700-1800	0	0

*Table 1: Typical HGV movements per hour.*

The LHA welcome that no HGV vehicles will be permitted to enter or exit the site during traditional school pick up and drop off times (0800-0900 and 1500-1600). However further information regarding how the site will manage development related HGV movements already moving on the local highway network during school peaks is required.

The Agent has stated within the document titled "Response to Highway Authority Consultation Response of 14 February 2025," that this can be addressed as part of the Construction Management Plan. However, this relates to the operation of the site rather than the construction phase of the development. Therefore, the question still remains as to where an HGV travelling towards the site can suitably, conveniently and safely wait when deliveries at the site aren't being accepted or to overcome known wider routing issues. As such, the LHA require a suitable strategy to be provided. It is recommended that several locations are identified, whether under the Applicant's control, part of the



existing provision within the adopted highway, or proposed as new provision within the adopted highway.

Referring back to Table 1, the programme outline represents a typical pattern of expected movements to and from the site, rather than a fixed schedule. This raises concerns for the LHA, as the potential for increased and unregulated HGV movements along the local highway network could result in a greater intensification of use, with implications for highway safety.

Therefore, should the Local Planning Authority (LPA) support the proposal while giving due regard to highway comments, under that remit the LHA would strongly suggest imposing a condition limiting the maximum number of vehicle movements whether to and from the site or their local routing (see below). This number and profile should also have regard to external influences of background traffic (volume and composition). For the avoidance of doubt, at this stage numbers are not agreed.

#### Impact along Lancaster Road and Local Highway Network

All HGV movements associated with the site will be routed to and from the junction between B5270 Lancaster Road/A588. It is suggested that these movements will then be split at the junction, with 37 HGVs travelling to/from the east and 37 HGVs travelling to/from the south along the A588. If the LPA support the proposal, it is important that these HGV numbers are also limited (but evidence based having regard to background traffic (volume and composition)). For the avoidance of doubt, at this stage these numbers are not agreed.

Lancashire County Council (LCC) between the 6<sup>th</sup>-12<sup>th</sup> October 2023 conducted a traffic survey in the vicinity of the proposed site access. The survey found that Lancaster Road had an average daily two-way traffic flow of around 3,100 vehicles per day. On average during the busiest hour, there were around 300 two-way vehicular movements.

To put this traffic survey into perspective during the proposals operating hours, the survey found that Lancaster Road generated the following two-way average flows. In the table we have highlighted how many HGV movements will be generated from the proposal using the same methodology as the TS which is highlighted in Table 1.

Note: 2 Axled Rigid Truck in the table below is an HGV:

Time	Total Existing Movements (All Vehicles)	Total Existing HGV and Bus Movements	Total Existing 4 Axled Rigid and Articulated Movements	Proposed Articulated Vehicle Movements	Percentage Increase of HGV Movements Following the Proposal
0700-0800	145	15	1	6	40%
0800-0900	243	27	1	0	0%
0900-1000	185	21	2	10	48%
1000-1100	193	15	1	10	67%
1100-1200	211	19	3	10	53%
1200-1300	200	17	0	10	59%



1300-1400	213	21	1	10	48%
1400-1500	221	24	1	10	42%
1500-1600	260	19	0	0	0%
1600-1700	255	19	0	8	42%
1700-1800	263	17	0	0	0%

*Table 2: Average Two-way traffic flows along Lancaster Road October 2023.*

As can be seen, the traffic surveys found that Lancaster Road already accommodates a degree of HGV (including articulated movements) and Bus traffic. However, the development proposals will lead to an intensification of large vehicle use. This is because the development when in operation will intensify the quantity of HGV traffic on Lancaster Road by 50% on average, when in operation. Network usage (in the vicinity of the site) by the proposal excludes school pickup/ drop off times (0800-0900 and 1500-1600) or during the PM Peak (1700-1800). This is because there are no movements scheduled to and from the site during these times, this principle is supported.

The LHA have no capacity issues associated with the corridor. However, the LHA do have concerns associated with the suitability of the route to support the additional HGV movements. This is due to the highway not being of sufficient width to support the needs of two-way HGV's, on Lancaster Road and the A588. This has highway safety implications as this proposal will increase conflict and subsequently the number of occurrences that HGVs will be required to reverse on the live network to allow another HGV to pass. This increases the risk of HGVs having to reverse and of which some will be without suitable visibility, notwithstanding the consequences on the stopping needs of approaching vehicles or the safety implications on vulnerable road users including pedestrians, cyclists and equestrians. This is along a part of the local highway network which has no physical pedestrian segregation from the live carriageway.

The LHA have witnessed these existing concerns first hand during the site visit on 14th November 2024 and have photographic evidence showing such. Please see the Appendices for the photographic evidence and these Appendices are split into the three key locations associated with the site and the local highway network:

#### *Lancaster Road (Appendix A)*

- Photograph 1: Equestrian using Lancaster Road.
- Photograph 2: HGV using the Vine House bend.

#### *Along the A588 adjacent to the access serving Fold House Farm (Appendix B)*

- Photograph 1: Picture shows a cyclist using the network and verge overrun.
- Photograph 2: Damage to the boundary wall at the bend.
- Photograph 3: HGV and car negotiating the bend.

#### *A588 Burned House Lane/ B5377 Park Lane/ U22436 Cemetery Lane junction (Appendix C)*

- Photograph 1: Picture of a HGV overlapping both running lanes as the vehicle is negotiating the bend along the A588, located adjacent to the two dwellings.



These photographs and video recordings have been shared with the Developers Agent. In response, the Agent has provided an email which provides links to two videos showing two HGVs using the bend adjacent to Vine House along Lancaster Road, 150m from the site access. Please see Appendix D for the still photographs.

*NOTE: In the location, where the two HGVs meet along Lancaster Road, the carriageway is approximately 5.8m wide adjacent to the access serving Vine House. However, within 30m east of this access, the carriageway reduces to 5m wide and at the next 10m interval is 5.1m wide. Therefore, it is where the carriageway reduces to 5m and 5.1m wide where the potential pinch point is located with two-way HGV movements not being possible, as will be discussed in the section below.*

The Agent also suggested some off-site highway mitigation package, from their perspective to mitigate the impact the proposal will have on the local highway network which will be discussed in the next section.

However, it is worth noting that the Agent and the Developers have not demonstrated whether the additional HGV movements can be dynamically managed to ensure the existing highway conditions are not worsened by the proposal. This approach if proposed will require careful thought and consideration and include suitable technology and be agreed with the LHA, to ensure that the number of HGVs on the network during each hourly period can be adequately mitigated against.

At this stage, the LHA are not satisfied with the approach presented, as there is a lack of clarity and detail on how such movements can be coordinated, particularly in ensuring that HGVs associated with the site do not meet along the local highway network, which could compromise highway safety.

### **Proposed Off-site Highway Mitigation**

The Agent has provided, as shown on Turner Lowe drawing number 220503/03/C titled "Highway Works" and Turner Lowe drawing number 220503/07 titled "A588 Fold House Farm Bend Proposed Signage," a package of off-site highway mitigation measures. These measures have been proposed along Lancaster Road, the junction between the A588/ Lancaster Road and along the A588, located adjacent to the access serving Fold House Farm.

These measures include the following:

#### *Lancaster Road*

- Widen the carriageway by 0.3m in both running lanes along Lancaster Road;
- Traffic signs including Heavy Plant Crossing Plates and a Signage Scheme located at the "Vine House" bend. This scheme includes warning road users of the narrow section of highway and that HGV's may need to cross the centreline. This sign will have flashing amber warning lights to make road users aware of the bend in the carriageway;
- SLOW Carriageway and edge of carriageway markings;



- New speed activated 30mph sign located to the west of the site access;
- Relocation of existing street furniture.

#### *A588- Adjacent to the access serving Fold House Farm*

- Signage and lining scheme which includes the existing carriageway and edge markings to be re-laid; SLOW carriageway markings; Traffic Signs denoting that the road narrows, there is bend in the road and a Road Plate stating that "oncoming vehicles in middle of road."

#### *A588/ Lancaster Road junction*

- The junction will be improved by combining the current two slip road arrangement into a single junction and widening of the A588 carriageway around the bend utilising the wide verge on the southeastern side;

Within this section of the report the LHA considers the mitigation proposed. I can initially confirm that the proposed junction arrangements at the A588 / Lancaster Road junction are acceptable and are considered suitable as part of the mitigation strategy. However:

#### Problem – Lack of Highway width for 2-way HGV movements along the full extents of Lancaster Road

The Agent within the TS has provided Turner Lowe drawing number 220503/03/C titled "Highway Works," which aims to widen the carriageway by 0.3m on both sides (where possible, see note below). This is by using the available verge which is the distance between the edge of the carriageway and the start of the hedge (root stock). Currently, Lancaster Road is a single carriageway road where widths are generally around 5.5m (it is important to highlight that the existing road isn't straight and greater carriageway width is needed to satisfy swept paths of larger vehicles), without footways and where verges exist which are variable in width, are less than 0.5m wide. At this stage no survey has been undertaken to evidence base what can be delivered.

*Notes: Wingmirrors for HGV's extend up to 0.25m and cars circa 0.15m beyond the width of the body (each side), with this extending the road construction width to the rootstock, whilst it might kill the hedge circa 150-250mm of carriageway would not be used. During the growing season, available carriageway width reduces. Width of an HGV is 2.55m + 2 wingmirrors at 0.25m = 3.05m.*

The Agent has provided Turner Lowe drawing number 220503/04.1/A titled "HGV Manoeuvres Sheet 1" and Turner Lowe drawing number 220503/04.2/A titled "HGV Manoeuvres Sheet 2." Within the TS, the Agent states in paragraph 4.12, that "*with the widened carriageway, there would be clearance between 2 HGV's passing over virtually all of the length of Lancaster Road from the site access to the A588. The exception is the bend at Vine House.*"

*Note: Verges are used to locate road signs, any widening would conflict with signage needs. Wing mirrors extend beyond carriageway width where widened, thus full width of any widening would not necessarily materialise in usable*



*carriageway width. Distance between edge of carriageway and any structure including signs should be 0.45m.*

The LHA have reviewed the updated drawings and based on that presented cannot fully determine whether two-way HGV movements can occur simultaneously along Lancaster Road (notwithstanding impacts on structures or the hedge growing season) with the exception of the bend at Vine House. This is due to the swept path analysis not accounting for HGV wing mirrors, which require an additional 0.25m clearance on each side.

The LHA are concerned without this information that:

- **Wing mirrors of HGVs are likely to continue to oversail hedges-** The wing mirrors of the HGVs are likely to continue to oversail the hedge which borders the carriageway. This will mean that the wing mirrors could be oversailing third party land, potentially conflicting with street furniture including any streetlights and potentially vulnerable road users should they be using the network, which is a highway safety concern.
- **Wing mirrors likely to overhang the centreline of the carriageway-** The wing mirrors of the HGVs are likely to overhang the centreline of the carriageway, which as highlighted on the submitted drawings, will be circa 6.1m wide (except at the Vine House bend) following the proposed widening. The wing mirrors overhanging the centreline, could cause potential conflicts to occur should the carriageway be accommodating two-way HGV movements (HGV with wing mirrors 3.05m wide). These conflicts could result in one or both of the HGVs reversing on the live highway network to find a suitable passing place to wait while another HGV passes. This could occur to prevent the two HGVs from being in conflict with each other should they try to pass in a forward gear.

Reversing movements on the highway increases the risk of collisions occurring especially if the reversing movements are involving HGV's. These movements will be occurring in a location which does not have access to any footways or informal segregation following the removal of the limited verge which provides limited protection from vehicular traffic for pedestrians, cyclists or equestrians use.

Removing this limited protection for sustainable road users will place HGVs in direct conflict with all highway users. This increases the risk of collisions with HGVs reversing blindly not only into other vehicles, but also sustainable road users should they be using the network at the same time. The proposal will intensify the quantity of reversing movements by HGVs along Lancaster Road which will be at the detriment of highway safety.

The LHA also question the feasibility and deliverability of the proposed carriageway widening. This is because of the following:

- **Variable hedge stock width-** The root stock of the hedge is variable and so there is an element of risk that the available highway width is less than advertised on the submitted plans. This is without further investigations being undertaken. Therefore, there is an element of risk that two-way HGV movements along Lancaster Road



may not be possible, contributing to the concerns highlighted above. The Applicant needs to have regard to this to overcome risk and will require a topographical survey to be undertaken, to accurately base designs on but also having regard to growing season, unusable highway as a consequence of wingmirrors and structures (with their safety requirements).

- **Driver behaviour-** Regard needs to be had to driver behaviour because vehicles are unlikely to drive on the edge of the carriageway extents which the updated swept path drawings are highlighting. This is because HGVs will be in direct conflict with the hedge, without a suitable Maintenance Strategy being proposed and delivered (which may not be possible given that the hedges are likely to be owned by third parties), which will damage their vehicles, leading to falling debris such as branches and twigs as well as parts from vehicles (i.e. wing mirrors, trim from vehicles etc) being left on Lancaster Road. This would be at the detriment and at the safety of other road users. Therefore, to prevent any conflict with the hedge, HGVs are likely to be off-set from the edge of the carriageway which will narrow the true width of Lancaster Road. Leading to two-way HGV movements along Lancaster Road not being possible. **This will lead to the issues as highlighted above.**

In Appendix E of this report, a photograph has been submitted via a neighbour's objection letter showing an HGV and a bus using the carriageway adjacent to the access serving Vine House. The behaviour of both drivers highlights the constrained nature of the road. Notably, the HGV does not utilise the full extent of the carriageway, further limiting available width.

In this location, the carriageway width varies significantly: it measures approximately 5.8m adjacent to the access, narrows to 5.0m within 30m of the access to the east, and then increases slightly to 5.1m over the next 10m interval. These constraints contribute to the situation depicted in the photograph, where two large vehicles attempting to pass simultaneously face operational challenges.

Although the LHA holds no formal records of how the incident unfolded, it is reasonable to assume that one vehicle may have had to reverse on the live network to avoid conflict. Such occurrences are likely to become more frequent should the proposal proceed, given the anticipated increase in articulated vehicle movements on the local highway network and driver behaviour constraining the true width of the carriageway especially during hedge growing season. Leading to issues highlighted above.

The Agent has proposed an HGV Delivery Strategy for the site to prevent two HGVs to and from the site meeting along Lancaster Road, which will be managed and controlled by the Site Manager. While the LHA do acknowledge that the site is able to control their own movements when HGVs are exiting the site, the Site Manager is unable to control other large vehicular movements along Lancaster Road (and those arriving at the site) and has failed, as presented, to provide a suitable strategy to dynamically manage movements to and from the site. This includes the quantity of movements which the site will generate per hour as well as how the site will ensure that two-articulated vehicles associated with the site will not meet along the local highway network. Therefore, as currently presented, there is a risk that two-HGVs could be using the carriageway simultaneously, which would likely lead to the above highlighted concerns arising. The



proposed intensification of HGV use by the development would lead to a substantial increased risk of this occurrence, notwithstanding the safety issues with vulnerable road users as previously highlighted. **This is without suitable mitigation being provided showing that two-way HGV movements can occur along the full length of Lancaster Road, without conflict and a suitable strategy being provided to control vehicular movements to and from the site.**

In addition, this matter is further exasperated at the bend adjacent to Vine House along Lancaster Road, 150m from the site access.

While, the Developers has provided two videos showing two HGVs passing each other at the access serving Vine House, it is 30m to the east where the carriageway narrows to 5m where two-way HGV movements are not possible. The Agent has continued to recognise this constraint and so has proposed the following strategies to mitigate the impact the proposal will have on this area. These strategies include the following, with the Developer proposing to deliver one or the other:

- A proposed give-way scheme along Lancaster Road adjacent to the access serving Vine House, giving priority to westbound traffic as shown on Turner Lowe drawing number 220503/04 titled "Highway Works with HGV Plots" dated February 2024; or
- A signage scheme, warning road users of "oncoming vehicles in the middle of the road," as shown on Turner Lowe drawing number 220503/03/C titled "Highway Works."

The LHA have already discounted the proposed give-way scheme along Lancaster Road with the LHA having concerns regarding the following:

- Poor inter-visibility for eastbound vehicles approaching the priority give-way, potentially leading to a greater propensity for shunt collisions if another vehicle was waiting. No information was submitted to disprove this concern;
- Whether adequate inter-visibility for a 30mph speed limited road (43m) could be provided at the give-way line without oversailing third party land; and
- The proposed physical narrowing of the carriageway adjacent to Vine House's access, as illustrated in the swept path drawing, raises concerns. The drawing shows that a car towing a caravan overlaps the physical feature when entering or exiting the property. Depending on the nature and dimensions of the feature proposed, such domestic movements, like from a car towing a caravan, will become unfeasible, resulting in restricted access to a residential property. A situation that is considered unacceptable from both a highway safety and accessibility standpoint.

Given these concerns, the Agent agreed to remove the strategy from the proposal and instead proposed that a signage scheme was provided.

However, the LHA are unable to support this proposed mitigation, raising concerns about the effectiveness of the signage scheme in preventing reversing movements on the live carriageway with the pinch point still remaining active and driver behaviour likely leading to any warning signage being ignored. Additionally, the location of the proposed signage



raises further concerns due to the existing highway constraints, which are discussed later in this section.

Given these unresolved issues, the LHA considers that the proposal would likely lead to an increase in collision risk, particularly during peak periods. It is noted that a collision involving a bus and a car travelling in opposite directions has been recorded on this bend near Vine House within the last five years. This illustrates the Highway Authorities concerns. As a result, the LHA are concerned that the proposed development would likely exacerbate these risks, resulting in a severe impact on the safety and operation of the local highway network, without an appropriate mitigation and delivery strategy being agreed.

#### Problem – Lack of verge area for vulnerable road users to wait along Lancaster Road and A588

As observed on the site visit by LCC officers and shown in the Appendices of this report, the highway network within the vicinity of the site is used by all road users including equestrians, cyclists and pedestrians.

*Note: Along Lancaster Road, pedestrians can use Public Footpath FP0203027 which is located adjacent to Vine House. While adjacent to and across from the site access, neighbouring properties have access to stables.*

Even though it is evident that movements by sustainable (vulnerable) road users occur along the local highway network no impact assessment has been undertaken to determine the quantum of users and no suitable mitigation has been proposed protecting them. In fact, widening the carriageway along Lancaster Road is likely to be at the detriment of these road users as it removes the limited protection a verge can provide and places them in direct conflict with vehicular traffic, as highlighted above.

The proposal also raises concerns that further collisions may occur along the A588, due to there being a lack of pedestrian segregation or any safe waiting areas from vehicular traffic. For example, in March 2023, a collision involved a pedestrian and an HGV at the junction of A588 Burned House Lane, B5377 Park Lane, and U22436 Cemetery Lane, where there is no segregation/ safe waiting areas and it is clearly evident that verges in this location are overrun.

Therefore, the LHA are concerned that any planned intensification of HGV usage on the local highway network alongside the lack of mitigation measures, could discourage sustainable road users from using the network and / or will increase the likelihood of an incident with a sustainable user.

#### Problem – Lack of Carriageway width for 2-way HGV movements along A588

The LHA recognises that the A588 is part of the strategic highway network and regularly accommodates HGV traffic. However, there are localised areas where two-way HGV and vehicular movements are not feasible (without conflict). These areas are near the access serving Fold House Farm, approximately 3.3 km east of the A588/B5270 Lancaster Road junction, and at the A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction, approximately 1.5 km south of the A588/B5270



Lancaster Road junction. Both locations form part of the development's HGV routing strategy with it being predicted that 37 HGVs will pass both locations each day.

The carriageway at Fold House Farm cannot support two-way HGV movements (without conflict), causing vehicles to wait or reverse when HGVs pass. Evidence of vehicle damage to boundary walls and signage highlights concerns about the route (Please see Appendix B). A signage scheme (Turner Lowe drawing number 220503/07 "A588 Fold House Farm Bend Proposed Signage") has been proposed to address these issues. However, the LHA questions its effectiveness, as two-way HGV movements are not possible which increases the risk of reversing movements needing to occur and subsequently the increase in collisions and safety of sustainable users. This is irrespective of what signage may be in place.

At the historic A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction, there have been four personal injury collisions recorded in the last five years. In fact, by reviewing the councils internal collision dashboard system, two out of the four collisions involve HGVs. With one of the two involving an HGV and a pedestrian.

The LHA acknowledges the historic nature of the junction but are concerned about compromising its safety further due to an increase in HGV traffic using the junction following this application. This is given the junctions existing constraints which include:

- Two-way HGV movements along the A588 at the junction are not possible without conflict. Please see Appendix C.
- Lack of intervisibility at the bend along the A588 due to the two detached dwellings obstructing the view of the carriageway ahead; and
- No formal and limited segregation for sustainable road users to use.

Therefore, the LHA are concerned that following 37 additional HGVs using the junction per day that there will be a greater propensity of collisions occurring, given the existing constraints.

However, to better understand the volume of HGV movements at the two identified pinch points along the A588, the LHA recommends that traffic surveys are conducted at both locations. This data will help assess daily traffic levels and inform a suitable delivery strategy.

The strategy should clearly demonstrate how the site will ensure that two articulated vehicles associated with the development do not meet along the local highway network and how all movements to and from the site will be dynamically managed. It should also identify appropriate waiting areas along the local highway network, should vehicles travelling to and from the site be located in close proximity to each other. **As currently presented, no suitable mitigation measures have been provided to address these concerns.**

#### Problem – Lack of appropriate verge area to place signage and street furniture

The Agent has proposed two signage schemes as part of the mitigation strategy for Vine House, located along Lancaster Road and along the A588 adjacent to Fold House Farm.



The Agent has also stated that a signage scheme could be provided at the A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction.

However, the LHA are concerned that the signs will not be placed in suitable locations to provide adequate warning to road users. This is because adjacent to Vine House, for example, the highway extents are even more constrained than other areas along Lancaster Road with the highway being bound by boundary walls, fences, hedges and private accesses to dwellings.

Although the Agent's "Supplementary Information Note: Queries Raised by Highway Authority January 2025" claims there is adequate width for Traffic Signs in this location, the LHA are uncertain as to whether the proposed signs are located within the highway extents. Notwithstanding, a Traffic Sign requires a 0.45m clearance from the carriageway edge to avoid vehicle strikes.

Reducing the minimum clearance width of the Traffic Signs could lead to them being struck and damaged. Placing signs abutting the edge of the highway means foundations would need to be set in third party land (and the sign oversailing it) which would require the permission of the landowner and may not be achievable where existing foundations exist.

These issues are present at the Fold House Farm bend along the A588 and at the junction between the A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane. Therefore, it remains unclear whether signage schemes in the three locations could be implemented and whether they will give adequate warning to road users about the constrained carriageway.

Even if these issues are addressed, there is an increased risk that reversing manoeuvres by HGVs at these two locations would still occur, following the intensification of use of the network following the proposal. This will cause a highway safety risk with a greater propensity of collisions occurring, given the existing constraints.

## **Conclusion**

The LHA acknowledges that the Agent has made efforts to propose a highway mitigation scheme aimed at addressing the impacts of the development on Lancaster Road, the Fold House Farm bend along the A588 and at the junction between the A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane. However, the LHA continues to raise the same concerns outlined in our previous comments dated 14th February 2025, which still remain outstanding.

These concerns include the feasibility of widening Lancaster Road, and the LHA note that no amended swept path drawing has been provided to demonstrate that full vehicles, including articulated HGVs with wing mirrors, can safely pass each other within the carriageway including a suitable factor of safety between vehicles and edge of carriageway. Without this evidence, the LHA do not support the assertion that two-way movements can be safely accommodated, and based on the current submission, it appears this is not achievable. Notwithstanding the issue of significance on vulnerable road users.



One location where two-way HGV movements cannot occur along Lancaster Road is at the bend located adjacent to Vine House. Here the Agent has proposed a signage strategy to warn users of the highway constraints. However, there is a lack of highway space to locate the proposed signs due to the existing available space being used to widen the carriageway and due to the highway being constrained by a hedge and third-party land.

Even if the Traffic Signs and other street furniture could be placed within the highway extents, there is still an element of risk that two HGVs could meet along the bend, leading to one having to reverse to find a suitable location along the carriageway, especially when the carriageway reduces to 5m in width. This has highway safety implications not only for other vehicles but also for the most vulnerable road users including pedestrians, cyclists and equestrians.

Having regard to pedestrian needs, there are no footways and following the widening of Lancaster Road there will be no limited protection on the verge for pedestrians (or other vulnerable road users) to wait as a vehicle passes. Therefore, pedestrians will have to walk within the carriageway following the removal of the verge.

Pedestrians walking in the carriageway along with HGVs potentially having to reverse along the carriageway to allow another to pass, reduces highway safety thus increases the likelihood of collisions and accidents. This can only be considered as resulting in a severe impact from a safety perspective to the local highway network as stated within Paragraph 116 of the NPPF (2024). This is due to the absence of a deliverable mitigation strategy for vulnerable road users as well as a deliverable mitigation strategy for two-way HGV movements to safely travel without conflict along Lancaster Road.

The A588 at the Fold House Farm bend and at the A588 Burned House Lane/ B5377 Park Lane/ U22436 Cemetery Lane junction is unable to accommodate two-way movements when HGVs are using the network. While this is an existing issue, the proposal will increase the number of articulated HGVs on the road which would lead to an increased risk of conflict and subsequent safety concerns as highlighted above.

No suitable strategies have been proposed to improve or mitigate these existing concerns to an acceptable degree. Nor has there been suitable delivery strategies provided highlighting how all movements to and from the site will be dynamically managed to ensure that the proposal will not exacerbate the existing conditions along Lancaster Road and the local highway network.

Therefore, given the significant concerns as detailed the LHA does not support the proposal as presented. Whilst the LHA is willing to have further communication with the Applicant, based on the strategy presented it is unlikely that issues can be resolved within the highway boundary. For the avoidance of doubt based on that proposed the LHA opposes the presented submission.

Yours faithfully

Ryan Derbyshire  
Team Lead Chorley, Fylde and Wyre  
Highway Development Control  
Highways and Transport



Lancashire County Council



**Appendix A**

**Lancaster Road**



Photograph 1: Equestrian using Lancaster Road (Image from the site visit conducted on 14<sup>th</sup> November 2024).





Photograph 2: HGV using the Vine House bend (Image from the site visit conducted on 14<sup>th</sup> November 2024).



**Appendix B**

**Along the A588 adjacent to the access serving Fold House Farm**



Photograph 1: Picture shows a cyclist using the network and verge overrun (Image from the site visit conducted on 14<sup>th</sup> November 2024).





Photograph 2: Damage to the boundary wall at the bend (Image from the site visit conducted on 14<sup>th</sup> November 2024).



Photograph 3: HGV and car negotiating the bend (Image from the site visit conducted on 14<sup>th</sup> November 2024).

**Appendix C****A588 Burned House Lane/ B5377 Park Lane/ U22436 Cemetery Lane junction.**

Photograph 1: Picture of a HGV overlapping both running lanes as the vehicle is negotiating the bend along the A588, located adjacent to the two dwellings (Image from the site visit conducted on 14<sup>th</sup> November 2024).



**Appendix D**

**150m from the site access located along Lancaster Road, adjacent to the access serving Vine House along Lancaster Road.**



Photograph 1: A still picture of a northbound HGV using Lancaster Road adjacent to the access serving Vine House (Image from a video sent by Baxter Groups which recorded two-HGVs passing at this location, with the videos sent on an email to the LHA dated 5<sup>th</sup> September 2025).



Photograph 2: A still picture of a southbound HGV using Lancaster Road adjacent to the access serving Vine House (Image from a video sent by Baxter Groups which recorded two-HGVs passing at this location, with the videos sent on an email to the LHA dated 5<sup>th</sup> September 2025).

**Appendix E**

**150m from the site access located along Lancaster Road, adjacent to the access serving Vine House along Lancaster Road.**



Photograph 1: Picture of a HGV and a bus negotiating the existing carriageway constraints adjacent to the access serving Vine House, located along Lancaster Road (Image from an objection letter received by the Local Planning Authority. Image sent to the LHA by the LPA dated 24/09/2025).