

**Proposed Minerals Extraction Scheme.
Bourbles Farm. Pilling.
Response to Highway Authority Consultation Response of 14 February 2025**

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May 2025**

1. Introduction

- 1.1 To avoid further protracted discussions on this application, this note provides a final response to the Highway Authority consultation response of the 14 February 2025 on the proposed mineral extraction scheme at Bourbles Farm, Pilling.
- 1.2 There have been several documents issued in relation to this proposed development over the life of the planning application. For the avoidance of any doubt, the Updated Transport Statement dated December 2024 provides the final transport assessment of the scheme incorporating previously issued statements and supplementary information. The Supplementary Information Note: Queries Raised by Highway Authority dated January 2025 provided responses to informal comments made at a meeting to finalised the assessment work and package of highway works that would accompany the development and also forms part of the supporting highways information. These comments on the final 14 February 2025 consultation response of the Highway Authority completes the supporting information package.
- 1.3 To avoid cross-referencing, extracts from the consultation response are provided in each section below.

2. Summary of Highway Authority Response

Summary

Objection

Lancashire County Council acting as the Local Highway Authority are of the opinion that the proposed planning application 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.

- 2.1 It is not considered that the development would have a detrimental impact on highway safety, indeed the package of highway works that would accompany the development, which without the development would not be provided, will improve highway safety in the area.

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3. Previous Consultation Responses

3.1 The February 2025 response correctly states that the Highway Authority formally responded to the application on the 14 February 2024 objecting to the application on the grounds of:

- i. Visibility at the site access
- ii. Ability for a vehicle to enter the site at the same time was leaving.
- iii. Swept paths of vehicles using the access
- iv. Width of Lancaster Road to accommodate two-way HGV traffic.

3.2 There is no mention of the Highway Authority response of the 7 May 2024 which upon receipt of additional information and specific proposals to address the width of Lancaster Road matter concluded:

Summary.

The developer has demonstrated that with suitable mitigation the previous concerns raised by LCC Highways have been addressed and that subject to suitable planning conditions the proposed development can be supported.

4. List of Documents and Description of Development

4.1 The list of documents and drawings referred to is correct and the conclusion is, therefore, based on the relevant documents. As will be seen below, however, it would seem that many of the items considered to be still required were in the documents referred to and have not been mentioned.

4.2 The Development is described correctly. The limited duration of the development, similar to, and in some instances less than, the construction phase of many individual large residential developments, has therefore been understood by the Highway Authority.

5. Site Access

5.1 Whilst the Highway Authority “accept the principles” of the internal access road, it is mentioned that the swept path plots produced to show that the access would operate satisfactorily, and more particularly safely, do not allow for wing mirrors. This is referred to again later in the consultation response so it is worth commenting on this at this stage.

5.2 All large scale, and some small scale, development proposals are accompanied by swept path plots showing how refuse and delivery vehicles will access a site. We have never seen a scheme be supported by such swept path plots that allow for wing mirrors. Many diagrams we have seen for schemes that have had no objection from

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the Highway Authority show only the path of the vehicle wheels, not even the body outline of the vehicles (which is what has been shown in this case). If there is clearance between the body outlines of two vehicles passing each other then that would normally be considered sufficient to allow for wing mirrors.

- 5.3 In this case the access road would be 6.7m. between the hedge forming the western boundary of the access road and a new 1.25m. high fence which would be part of the fence and hawthorn hedge eastern boundary. Assuming the widest HGV is 2.5m. wide, this therefore leaves 1.7m clearance. Even ignoring the fact that a HGV's wing mirror could pass over the 1.25m. high fence on the eastern side and still be within the land controlled by the applicant, there would be ample room for wing mirrors and we cannot understand how the Highway Authority considers that the supporting drawings, the same as submitted on countless other schemes, do not provide them with information they need.
- 5.4 The response goes on to say (spread over several paragraphs so extracts have not been provided) that the access should have a visibility splay of 2.4 x 58m. but that only 1.2 x 43m. can be provided. This is grossly misleading.
- 5.5 The site access originally took the form that was agreed with the Highway Authority at the time and confirmed in the consultation response to the planning authority of the 7 May 2024. The access provided the visibility splay which the highway authority requested based on the speed of traffic using Lancaster Road that had been determined from a survey undertaken by the authority to assess the effects of the then recently introduced 30 mph speed limit. At the time average speeds and the 85%ile speed which is used in highway design, were in excess of 30 mph. The splays requested could be provided within the highway boundary. The splays were shown at the time from a 2.4m setback from the edge of carriageway.
- 5.6 As the scheme developed it was considered that designing an access based on drivers travelling at illegal speeds was illogical and it would be better to attempt to get drivers to drive at legal speeds, which would then result in a visibility splay appropriate for the speed limit. Accordingly a speed activated Warning Sign was included in the highway works to be provided as part of the development. This meant that the appropriate splay would be 2.4 x 43m.
- 5.7 Following the statement that the 7 May 2024 letter should not have been issued by an email to the applicant on the 18 July 2024, a meeting was arranged. At that meeting (02/09/2024) it was agreed that the access should be amended slightly within the land available. It was also stated that the access splay could be measured from a 1.2m setback and with the speed activated Warning Sign the splay would be 1.2 x 43m. The access was amended and submitted for agreement prior to a second meeting. This was agreed by email prior to that second meeting on the 17 September 2024 as per extract from email below.
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3. Lancaster Road

Prefer the carriageway being widened to its maximum than reducing the width any further.

4. Visibility splay at access

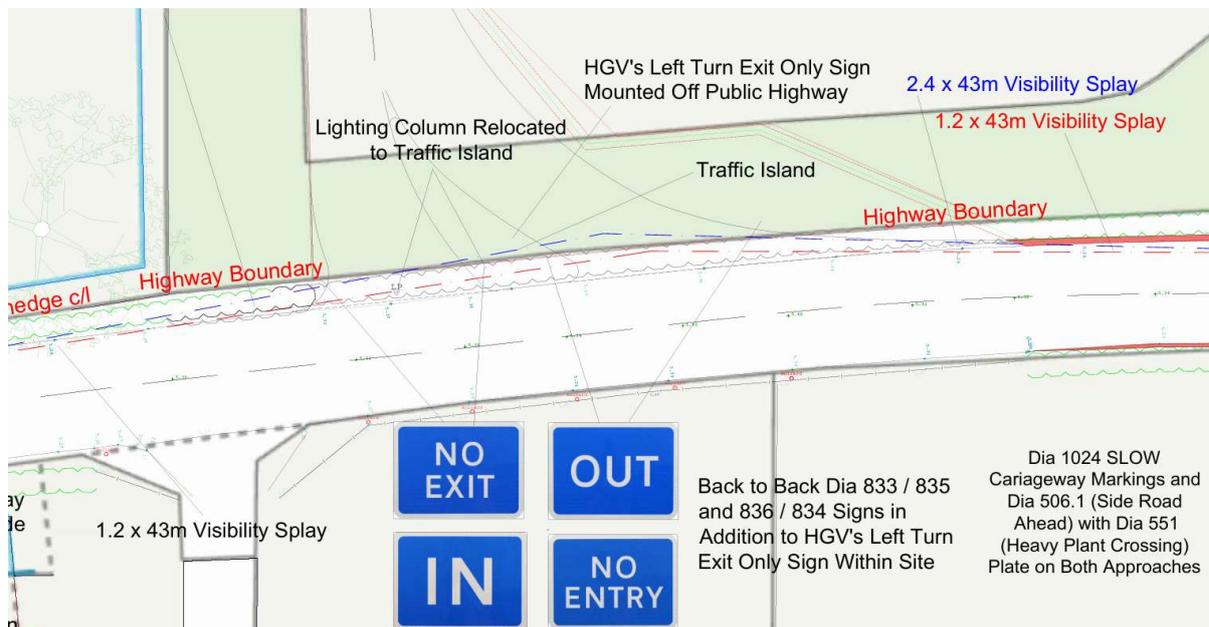
Happy to accept 1.2m for HGVs.

Hope this note helps.

Kind regards

Ryan Derbyshire MCIHT
Team Lead Chorley, Fylde and Wyre

- 5.8 At the second meeting (held on the 20/09/2024) the access was agreed. It has been shown in this agreed form since September 2024 with a 1.2 x 43m splay.
- 5.9 It is now apparently considered that the splay should be 2.4m x 58m, or in line with the illegal driving that was taking place on Lancaster Road, and ignoring the previously agreed 1.2m set-back. It is also incorrectly stated that the access can only provide a 1.2 x 43m splay. The drawings simply show what was agreed. Had it been considered that the previously agreed 1.2m was no longer appropriate, or that there should be no attempt to control driving to the speed limit, this could have been said at any time and certainly before a third meeting that took place in December 2024 when all outstanding matters were supposedly presented so that a final submission could be made and this was not mentioned.
- 5.10 The 2.4m set-back is stated to be necessary to allow the access to be used by light vehicles. This must have been known when the 1.2m set-back was “happily accepted” as above.
- 5.11 Firstly, if this was thought to be a valid concern, as the site has an existing access used by, and is clearly suitable for use by, light and agricultural vehicles the new Lancaster Road access could be limited for use by HGV’s by way of a planning condition. This would, however, be unnecessary as a 2.4m set-back can be provided as originally proposed, totally within the highway. The extract from the site access drawings below shows that a 2.4m splay can easily be provided. This has been drawn at the required 43m for traffic travelling at 30 mph. A longer splay could be accommodated (and in such a case the speed activated warning sign would not be provided) but it seems perverse to do this and accept that drivers are travelling in excess of the speed limit and do nothing to address this.

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5.12 As can be seen above, the splay would be well within the highway boundary or the land that has been acquired for the new access. It should also be noted that visibility splays are measured at a height of 1m above ground level. The hedges in this area are kept at or below this height and so there would be no need to remove any existing hedge other than to physically accommodate the access.

5.13 It is impossible to see how the incorrect available visibility distances have been measured as nothing has been presented to demonstrate this. The above extract is, however, based on the accurate topographic survey that has been undertaken for the development and the definitive highway records, and shows that significantly more than a 2.4 x 43m splay could be achieved.

5.14 We cannot, therefore, understand the comment:

“The matter on vehicular visibility isn't positively concluded”.

Everything needed to conclude that the visibility at the site access is as required, and previously agreed, has been provided.

6. Trip Generation

6.1 The response provides an extract from the Updated Transport Statement showing the number of expected arrivals and departures to and from the site during a typical day. It is noted that the table shows no departures in the 16.00 – 17.00 period and concludes:

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“further clarity on this is sought”

- 6.2 The table extracted from the Updated Transport Assessment should show 4 departures in the 16.00 – 17.00 hour to match the arrivals. This is a typing error. The table presented in the response omits the effects of the development on the A588 each side of Lancaster Road which is shown directly next to the figures extracted in the Updated Transport Assessment, which for the same period shows 2 departures in each direction. For there to be 4 departures using the A588 there must be 4 departures from the site. The effects on the A588 are exactly as indicated in the Updated Assessment.
- 6.3 The Highway Authority ask how HGV’s would be managed to ensure that during school start and finish times they would not be using the highway network in the vicinity. This would be covered in the CEMP, which would be conditioned as part of the planning consent, as would be the case for all schemes where it is agreed that HGV activity should not take place at certain times of the day. This is a normal practice and should not be relevant to the planning process. We are not aware of any other schemes where the Highway Authority have required that details be provided of where a HGV would wait if it found itself in the vicinity of the development at a time when deliveries were not being accepted at the planning application stage. If there is a planning condition in place it will be for the applicant to ensure that it is complied with in a lawful manner.
- 6.4 It is also stated that the traffic movements are quoted as averages and there could be higher flows at certain times. This is what an average is, and whilst there may be times when the flows were higher these times would be balanced by times when there were less.
- 6.5 This is the standard way of presenting the effects of any development where there were earthworks involved and we wonder why it was thought necessary to advise the planning authority what an average rate was without mentioning the times when activities would be below the average rate.
- 6.6 The Highway Authority then state that should the LPA support the application they would want to condition the maximum movements to and from the site. The maximum practical activity on the site is already specified in all versions of the Transport Assessment and has never been questioned. Should this be conditioned, then if conditioned to the figure that has already been quoted, this would be acceptable.
- 6.7 The Highway Authority then look at the percentage increase in HGV’s during particular hours of the day.

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- 6.8 At certain times of the day, when the existing HGV flows are low, the average 3 - 5 vehicles arriving and departing each hour would lead to a high percentage increase. The total HGV traffic would still, however, be very low in terms of levels which would warrant any further assessment. This was fully detailed in the Updated Transport Statement (indeed this was one of the reasons for the Statement to be updated) and has never been questioned.
- 6.9 The Updated Transport Statement sets out the advice of The Institute of Environmental Management and Assessment (IEMA) in their guidelines: Environmental Assessment of Traffic and Movement (2023). These replace advice issued in 1993 by the Institute of Environmental Assessment: Guidelines for Environmental Assessment of Road Traffic. Both documents advise that an increase of 30% in HGV's on an annual daily basis is required to warrant any environmental concerns. The 2023 guidance gives a further threshold of 100 HGV's per day for Air Quality and Road Safety matters. The traffic generation of the proposed development is far below these thresholds. No guidance advises that increases in any particular hourly period is an appropriate way of considering the environmental effects of a development.
- 6.10 We are somewhat surprised that having asked for this additional information to be provided, leading to the issue of the December 2024 Updated Transport Statement, the advice of the IEMA is then specifically ignored and the planning authority has been given the impression that a few additional HGV's in any particular hour should automatically be a source of concern.
- 6.11 We are pleased to see that the Highway Authority do not consider that the development would lead to any capacity issues and the concern is an increase in HGV's and the resulting apparent increases in risk of vehicle / vehicle or vehicle / pedestrian / cyclist collisions.
- 7. Supporting Highway Works**
- 7.1 The limitations of the highway network in the vicinity are accurately described by the Highway Authority.
- 7.2 The need to provide improvements to Lancaster Road has never been opposed.
- 7.3 There are two elements of the highway works package for Lancaster Road; one covering the general length between the site access and the A588; and one covering the bend adjacent to Vine House and Pointer House.
- 7.4 On the main section of Lancaster Road, a HGV associated with the development would not pass another development associated HGV travelling in the opposite direction as this would be prevented in the CEMP which would be a condition of any
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planning consent. To assist the passage of a HGV associated with the development and another unassociated HGV (of which the authority's survey shows there to be few in number and most would not be the width that is being assumed in the swept path plots) it has been proposed from the outset that the carriageway would be widened up to the edge of the hedge when trimmed. This would give an approximate 300mm additional carriageway on each side of Lancaster Road.

7.5 As detailed in the Supplementary Information issued in January 2025, this would give a clearance of 500 – 600mm between the largest size vehicles and obviously more for smaller HGV's. This distance assumes that the vehicles are travelling along the edge of the widened carriageway. The clearance would be more than needed to accommodate wing mirrors etc. It should also be remembered that a HGV driver can move the offside mirror flush with the side of the vehicle when passing close objects.

7.6 The argument that the verge needs to be maintained to accommodate signage and space for pedestrians to walk is flawed. Whilst this may be a general desire, the Supplementary Note provides many examples of the situation on the A588 in this vicinity where signs are located in hedgerows or even behind hedgerows. As an example a couple of the images in the Supplementary Note are reproduced below.



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- 7.7 The last two images above also show the carriageway extending to the face of the hedge with a longitudinal lane to direct light traffic away from the edge, exactly as proposed for Lancaster Road. The comment that it has not been demonstrated that the proposed works would not effect the roots of the hedge is not valid as what the
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Highway Authority have done themselves demonstrates that any issues with roots can be addressed at the detailed design stage.

- 7.8 In the case of the comment that the verge is necessary for pedestrians, at the present time it is not used by pedestrians. With the carriageway widened and white line provided, the space will be useable by pedestrians. If desired, the widened area of carriageway could be colored to give further indication that this was only for the occasional HGV use and general vehicle should use the original carriageway width.
- 7.9 It should also be noted, as set out in the Transport Statement, there are numerous public footpaths and bridleways throughout the surrounding areas as below. Indeed, as also set out in the Transport Statement there is one which runs through the site which will have to be temporarily diverted as part of the scheme. There have been no requests for these to be upgraded as part of the development, and, therefore, these routes must be considered suitable for pedestrians and horse riders use should they wish to use these as an alternative to Lancaster Road.



- 7.10 In the case of the bend adjacent to Vine House and Pointer House, it has always been acknowledged that widening the carriageway without affecting the hedges would still not allow two maximum size HGV's to pass.
- 7.11 The original scheme agreed with the Highway Authority provided for a single file section to be created giving priority to traffic travelling westwards. After this was approved it was claimed that such arrangements were inherently unsafe and this was no longer acceptable. A document was prepared looking at the safety record of several of these arrangements elsewhere which showed they did, in fact, have a good

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safety record. This option was still considered unacceptable, however, due to the approach visibility of the single file section which in the cases cited was good, but it was alleged that this would not be the case on Lancaster Road. As the drawings prepared for this option showed that the required visibility to comply with DfT standards (and hence for the arrangement to be safe) were met this was not a valid objection.

7.12 As the alternative warning signage only scheme, which has been taken forward since the first meeting in September 2024 and not objected to at any subsequent meeting, was suggested by the Highway Authority themselves, the original proposals were amended to the form suggested. It is, however, maintained that the originally approved proposals comply with DfT standards and are safe.

7.13 The January 2025 Supplementary Information Note looked in detail at all sign locations associated with the current schemes and demonstrated that all proposed signs could be provided, all within the highway.

8. Effects on A588

8.1 There are two bends on the A588 which have been identified by the Highway Authority as locations of concern.

Effects on A588 at Fold House Farm

8.2 There have been no recorded accidents at this junction in the last 5 years. In fact the last recorded accident was in 2015 when two cars collided on the bend.

8.3 The applicant was requested to investigate this junction, despite there being no accidents identified in the search undertaken for the original Transport Assessment, at the second September 2024 meeting. It was suggested that signs indicating HGV's may approach in the centre of the road be provided as part of the development. These were then proposed as part of the development from thereon with the question of whether the signs could be provided within in the highway raised at the December 2024 meeting. The January 2025 Supplementary Information shows where the signs could be provided, all within the highway.

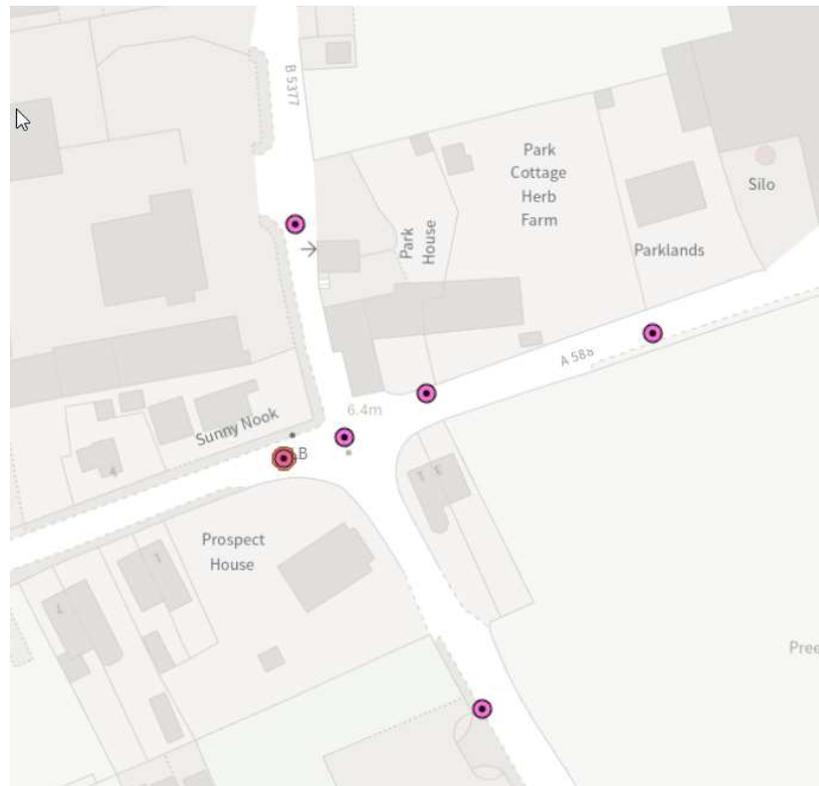
8.4 Had such signs been erected by the Highway Authority the 2015 accident may not have happened.

Effects at A588 Burned House Lane / B5377 Park Lane / Cemetery Lane junction

8.5 It is claimed that there have been 4 accidents at this junction in the last 5 years.

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- 8.6 This is not strictly correct. As can be seen from the accident plot below, the accident on Park Lane occurred over 40 m from the junction on a stretch of highway that would not be affected by any traffic on the A588 (the only route that would be used by the development traffic).



- 8.7 The accident on Cemetery Lane occurred outside the access to Prospect House, well away from the junction and again on a section of highway that would not be used by development traffic.
- 8.8 The accident on Burned House Lane was also well away from the junction. This involved a goods vehicle (size not recorded) colliding with a pedestrian walking in the carriageway with their back to on-coming traffic.
- 8.9 The only accident that occurred actually at the junction involved a car and a motorcycle. From the damage reported that would have been travelling in opposite directions. The signage suggested in the Supplementary Information may have prevented this accident.
- 8.10 The Statement that there have been 4 accidents at this junction which could indicate that the HGV traffic from the development would lead to an unacceptable increase in accident risk is not justified.

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- 8.11 The highway records for both junctions do not show the edge of the carriageway (as is also the case for Lancaster Road. This means the whole of the verge / footway at each junction is within the highway. The January 2025 Supplementary Information Note set out where the signs proposed as part of the development could be located. The statement that “exact placement has not been provided” is misleading, as is the statement that a sign requires 400mm clearance from the carriageway edge and must be contained within the highway.
- 8.12 This was fully considered in the January 2025 Supplementary Information. Signs similar to those already in existence on the A588 could be provided and it is deeply worrying that these two bends are known to the Highway Authority, are considered to be potential accident sites, no proposed signage of any form is proposed by the Authority to address this acknowledged concern, and any offer of signs that would improve safety at the two junctions and be similar to many other signs in the vicinity, cannot be accepted. It is apparently acceptable, therefore, for these two junctions to remain unsafe. We would hope that there is not a serious or fatal accident at either of these two junctions as with this offer and statement on record, we have no doubt the Highway Authority would be found guilty of serious negligence by a court.
- 8.13 As stated in the Supplementary Information, the A588 is the main route through this area and its A588 designation means that it is the intended route for commercial traffic. It is a pity that the highway authority now claim that this has been investigated and there would be concerns over any increased HGV use, but they have no proposals to improve the apparent safety record which causes them such concern, yet the proposed development which would provide signs which if they had been erected sooner, may have prevented the accidents that have been recorded, at no cost to the authority, is opposed.
- 8.14 The A588 would be used by construction traffic generated by any major project (such as housebuilding) in the area. In 2008, The TRICS consortium produced a Technical Report on the construction traffic likely to be generated by major construction projects (simply titled “Construction Traffic”). This report used 2007 Key Performance Indicators to provide a likely construction period commercial vehicle trip rate of 29.4 trips (one-way) per £100,000 project value.
- 8.15 Since then subsequent UK Performance Reports have shown the mean rate reducing and the rate for small scale developments under £1m increasing. The last report we have seen was for 2014. The TRICS report has not been updated to reflect this.
- 8.16 Assuming a residential development of 100 homes in this area the project value could be £25m to £50m. Taking the lowest level, the TRICS rate would give 7,350 commercial trips over the projects construction period. Not all of these would be HGV’s but there would certainly be a high proportion.
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8.17 If it is considered that the A588 cannot accommodate any increase in HGV's then no development that would be accessed via the A588 (a classified road, designated as such so it can be used for strategic HGV movements) could ever be permitted. This would need to be a stated policy of the Highway Authority, which, of course, it is not.

8.18 The proposed development would operate under a CEMP that would prevent HGV activity during school start and finish times, and provide warning signs at the two locations identified as locations of concern, but which the Highway Authority proposes to take no action.

9. Conclusion

9.1 It is considered that the applicant has demonstrated that the minerals development could take place without any material effect on highway safety, with the mitigation measures and highways amendments proposed in the detailed submissions.

9.2 It is considered that the applicant has demonstrated that the minerals development could take place without any material effect on highway safety, with the mitigation measures and highways amendments proposed in the detailed submissions.

9.3 It also accepted that the proposed mineral scheme would have no effect on the capacity of the local highway network due to the relatively low number of HGV traffic movements generated from the proposed development.

9.4 From the information provided and the assessment work completed, we consider that all of the potential highways concerns raised as part of this scheme are readily capable of being addressed by planning conditions