



**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**SUMMARY OF EVIDENCE OF  
RYAN DERBYSHIRE MCIHT**

**TRANSPORT**

**LANCASHIRE COUNTY COUNCIL**

**MYTAX FARM, 4 BOURBLES LANE, POULTON-LE-FYLDE, FY6 0PE**

**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.**

**PLANNING INSPECTORATE REF: APP/Q2371/W/25/6002168**

**LOCAL PLANNING AUTHORITY REF: LCC/2023/0030**



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## 1. Introduction

### 1.1. Qualifications and Experience

1.2. I (Ryan Derbyshire) am the Team Lead for Wyre, Fylde and Chorley in the Highways Development Control Team of Lancashire County Council (LCC). I represent the Local Highway Authority (LHA) with over 6 years of experience in Planning and Highways Development Control.

1.3. I am a Member of the Chartered Institute of Highways and Transportation and I also hold a BSc (Hons) in Human Geography and a Master of Science in City Futures, both awarded by Cardiff University.

1.4. The evidence which I have prepared and provided in this Proof of Evidence is correct and I confirm that the opinions expressed are my true opinions.

### 1.5. The Local Highway Authority

1.6. Lancashire County Council in its role as the Local Highway Authority (LHA), is a statutory consultee to Local Planning Authorities in Lancashire in relation to all planning matters with an impact on the local highway. This includes the County Council as the Local Planning Authority (LPA) for determining planning applications related to minerals and waste and the County Council's own development proposals.

- 1.7. As the LHA, Lancashire County Council is responsible for providing and maintaining a safe and reliable highway network. In this regard, the LHA have previously provided consultation comments to the LPA following its assessment of the transportation and highway matters associated with the proposed minerals extraction and backfilling scheme.
- 1.8. In my statutory consultation response, I concluded that the proposed development would result in unacceptable impacts on highway safety that cannot be adequately mitigated. These concerns were set out in my formal comments dated 7<sup>th</sup> October 2025, which are included in Appendix 1.
- 1.9. I had also previously raised the same concerns in my statutory comments issued on 14<sup>th</sup> February 2025, which are provided in Appendix 2.
- 1.10. I have prepared this highway proof of evidence (PoE) following the lodge of an appeal by the Appellant, Baxter Group Ltd, in response to the refusal of the application by Lancashire County Council dated 20<sup>th</sup> October 2025.
- 1.11. This PoE in conjunction with the Statement of Common Ground (SoCG) (and also the statutory consultation responses provided to the LPA) provides my response to the primary transport documents submitted by the Appellant. These documents include:
- Updated Transport Statement (December 2024), which includes a range of highway related drawings, including swept path analysis,

access arrangements, and proposed mitigation plans. Of which the following relevant drawings have been appended to this PoE

(Appendix 3):

- Turner Lowe drawing number 220503/03/C titled "Highway Works;"
  - Turner Lowe drawing number 220503/04.1/A titled "HGV Manoeuvres Sheet 1;"
  - Turner Lowe drawing number 220503/04.2/A titled "HGV Manoeuvres Sheet 2;"
  - Turner Lowe drawing number 220503/05/B titled "Access Arrangements;"; and
  - Turner Lowe drawing number 220503/07 titled "A588 Fold House Farm Bend Proposed Signage."
- Supplementary Information Note: Queries Raised by Highway Authority (January 2025); and
  - Response to Highway Authority Consultation Response of 14 February 2025 (May 2025).

1.12. Scope and Structure of the Evidence

1.13. My evidence has been produced specifically to address Reason for Refusal 1 set out in the application's decision notice dated 20th October 2025 (Appendix 4), which states that:

1.14. *"The development would have unacceptable impacts on highway safety which cannot be adequately mitigated and therefore conflicts with Paragraph 116 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan".*

1.15. The structure of my proof of evidence is as follows:

- Section 2 provides a brief description of the proposed development and the sites location in the context of the local and strategic road network.
- Section 3 highlights the relevant national and local planning policy applicable in regards to transport and this appeal application.
- Section 4 provides a summary of the concerns previously raised within my statutory consultation responses, in relation to the proposed development.
- Section 5 sets out my highway safety concerns associated with the proposed access in regards to vehicular visibility.
- Section 6 details the highway issues and impacts along the proposed route and provides an assessment of the Appellant's proposed mitigation strategy.

- Section 7 presents my conclusions.

## **2. Proposed Development**

2.1. The appeal site relates to land at Mytax Farm, 4 Bourbles Lane, Poulton-le Fylde. The application consists of development involving the extraction and processing of sand and gravel with backfill of the excavation using imported inert fill materials.

2.2. The description of the proposed development is set out and has been agreed as part of the SoCG.

### **2.3. Local Highway Network**

2.4. This section will describe the site location in the context of the local and strategic highway network.

### **2.5. Bourbles Lane**

2.6. Bourbles Lane is a private, single track rural road extending from Little Tongues Lane to the A588 Head Dyke Lane. It serves a small number of scattered farms, dwellings and field gate accesses along its length, including access to several fields associated with this development and is subject to the national speed limit (60mph).

- 2.7. Bourbles Lane along its entire length, provides access to two Bridleways, BW0203026 and BW0203021, which forms part of an extensive Public Rights of Way network within the vicinity of the site. Numerous Public Footpaths connect to these bridleways, as illustrated in Appendix 5.
- 2.8. It has been agreed as part of the SoCG that no vehicles associated with the development will use Bourbles Lane, when accessing and egressing from the site.
- 2.9. Little Tongues Lane
- 2.10. Little Tongues Lane is a residential, single carriageway road maintained at public expense, which extends from Sandy Lane (B5270) to the south and Bourbles Lane to the east. It is subject to the national speed limit (30mph by virtue of street lighting) and provides access to Public Footpath FP0203020 to the north. The carriageway width along Little Tongues Lane is variable, ranging from 4.8 metres to 6.1 metres in localised areas along its length.
- 2.11. Little Tongues Lane provides a footway along the western side of the carriageway, although this terminates approximately 155 metres from the junction with Sandy Lane. The eastern side of the carriageway is characterised by verges and private driveways. On-street parking occurs predominantly along the eastern extent of the lane, restricting the effective carriageway width.

- 2.12. Given the presence of on-street parking that narrows the available carriageway, combined with the residential nature of Little Tongues Lane and the associated high level of pedestrian activity, it has been agreed within the SoCG that the lane is unsuitable for HGV traffic.
- 2.13. Gaulter's Lane
- 2.14. Gaulter's Lane is a private, single tracked rural road, approximately 3 metres wide, extending eastwards from Sandy Lane (B5270) before it terminates 380m from the junction. It serves a small number of scattered farms and dwellings along with a field associated with the proposed development. Gaulter's Lane also provides access to Public Footpath FP0203028, which passes through the development site connecting to Bridleway BW0203021 located along Bourbles Lane.
- 2.15. The private road is subject to national speed limit (60mph), and it has been agreed within the SoCG that the lane is unsuitable for HGV traffic due to the constraints associated with its effective carriageway width.
- 2.16. Lancaster Road / Sandy Lane (B5270)
- 2.17. The B5270 is a single carriageway road which stretches from Knott End On-Sea to the A588.

2.18. The site would be accessed via a new junction on the B5270 (Lancaster Road), located approximately 250 metres east of its junction with the A588. The carriageway between the proposed access and the A588 generally varies in width from around 5 to 6 metres. The edge of the carriageway from the proposed site access to the A588 junction, is un-bound, with no kerblines or edging to provide lateral support.

*NOTE: In Appendix 6, I have provided a study which showcases the existing carriageway width of Lancaster Road from the proposed site access to the junction with the A588. I have undertaken measurements at 10 metre intervals along the route.*

2.19. Lancaster Road was previously derestricted (60mph) however the speed limit was restricted to 30mph in 2022 to improve road safety, as part of a highway scheme introduced by Lancashire County Council. There are no footways along Lancaster Road, and the carriageway is bound by narrow verges and hedgerows on both sides, within which street-lighting columns are positioned, as evidenced within Appendix 7.

2.20. There is evidence of non-motorised users which use Lancaster Road. These include:

2.21. **Cyclists.** Lancaster Road is frequently used by organised cycling groups, including Garstang Cycling Club, as well as by individual cyclists. This is evidenced by photographs taken during multiple site visits, which show

cyclists travelling along the route. Google Street View imagery dated March 2023 also captures a cyclist passing Pointer House, Lancaster Road.

These images are provided in Appendix 8.

2.22. **Pedestrians.** Lancaster Road provides access to the nearest bus stops located on Head Dyke Lane (ID: 25001747, lanatdwg), approximately 300 metres east of the site access outside Ranch House, and on Sandy Lane (ID: 250012151, lanagwmg), approximately 560 metres west of the site access outside Willow House, as shown in Appendix 9. Both stops operate on a "hail and ride" basis and are served by commercial services to Lancaster and Knott End-on-Sea via services 88 and 89, as well as several school services (528, 541, 567, 901, 902, 903, 904 and 905). Lancaster Road additionally provides access to Public Footpath FP0203027, located approximately 165 metres east of the proposed site access at Pointer Farm, which connects through adjacent fields to Bourbles Lane.

2.23. **Equestrians.** Several private equestrian holdings are located along Lancaster Road and the surrounding areas, including those at Pointer Stables (located opposite the proposed site access), Hillfield House (located approximately 100 metres to the east of the proposed site access), Pointer Farm (located approximately 160 metres to the east proposed site access), and Pointer Cottage (located approximately 220 metres to the east proposed site access) as shown within Appendix 10. Lancaster Road also connects, via the A588 and Tongues Lane, to Bridleways located along

Bourbles Lane. Evidence of equestrian activity along Lancaster Road and the A588 is included in Appendix 8.

2.24. Head Dyke Lane / Burned House Lane (A588)

2.25. The A588 provides strategic connections to Lancaster and the M6 to the north, and to Blackpool to the south via the A585 Trunk Road and the M55. The A588 is approximately 32 kilometres in length and will be used by Heavy Good Vehicles (HGVs) accessing and egressing the site, as well as by operatives travelling to and from the development. For the purposes of this PoE, the defined highway area of influence along the A588 extends from its junction with the B5270 (Lancaster Road) to the A588/C414 Bradshaw Lane junction to the east (approximately 3.7 kilometres), and to the A588/C403 Moss Side Lane junction to the south (approximately 2.9 kilometres).

2.26. Along the defined highway area of influence, the A588 is a single-carriageway road that varies in width and the edge of the carriageway is predominantly un-bound, with no kerblines or edging to provide lateral support. There is clear evidence of verge overrunning along this section, as discussed further in Section 6 and illustrated in the photographs contained in Appendix 8. The speed limit along the route varies between 30mph and 60mph, with average-speed cameras installed on certain sections. The introduction of the average-speed cameras and the variation in speed limits were introduced in 2022 as part of a Lancashire County Council road safety scheme, following funding being provided by the Safer Roads Fund

programme established by the Department of Transport. Funding was provided to improve safety on England's 50 most dangerous A-roads, with the A588 being included within the scheme (Appendix 11).

- 2.27. From the A588/ B5270 junction to the A588/C414 Bradshaw Lane junction to the east and to the A588 Burned House Lane, B5377 Park Lane and U22436 Cemetery Lane junction to the south (approximately 1.5 kilometres), limited footways are provided. Along these sections, the carriageway is bound by narrow verges, hedgerows or third-party land, as illustrated in the photographs and plans contained in Appendix 8.

### **3. Planning Policy**

- 3.1. This section highlights the relevant national and local planning policy applicable in regard to transport and this appeal application.

3.2. National Planning Policy Framework (December 2024)

- 3.3. I consider the following paragraphs of the National Planning Policy Framework (NPPF, December 2024) to be relevant in the determination of this Appeal.

*115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;**
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.**

116. *Development should only be prevented or refused on highways grounds if there would be **an unacceptable impact on highway safety**, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*

117. *Within this context, applications for development should:*

- a) *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are **safe, secure and attractive** – which **minimise the scope for conflicts** between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

3.4. Joint Lancashire Minerals and Waste Local Plan (September 2013)

3.5. I consider the following policy within the Joint Lancashire Minerals and Waste Local Plan (September 2013) to be relevant in the determination of this Appeal:

*Policy DM2 - Development Management*

*Development for minerals and waste management operations will be supported where it can be demonstrated to the satisfaction of the mineral and waste planning authority, by the provision of appropriate information, that all material, social, economic or environmental impacts that would cause demonstrable harm can be eliminated or reduced to acceptable levels. In assessing proposals account will be taken of the proposal's*

*setting, baseline environmental conditions and neighbouring land uses together with the extent to which its impacts can be controlled in accordance with current best practice and recognised standards.*

3.6. Wyre Local Plan (2011-2031)

3.7. I consider the following policy within the Wyre Local Plan (adopted January 2023) to be relevant in the determination of this Appeal:

*CDMP6 Accessibility and Transport (relevant parts of policy)*

*1. Development will be permitted provided it meets the requirements of the Core Development Management Policies and it has been demonstrated that :*

*1b) Road safety and the safe and efficient and convenient movement of all highways users (including bus passengers, refuse collection vehicles, the emergency services, cyclists and pedestrians) is not prejudiced.*

*1c) Safe and adequate vehicular, cycle and pedestrian access to and from and circulation within, a proposal site would be provided.*

*3. Where a development has an adverse impact on the existing highway network, developers or operators will be required to provide or contribute to such works to the transport network including sustainable travel measures as are necessary to mitigate these impacts.*

*4. Where the above requirements can only be satisfied through the undertaking of off-site works the costs of these shall be borne by the developer.*

#### **4. Summary of Issues**

- 4.1. My statutory comments which are provided in Appendix 1 and Appendix 2 of this PoE set out the areas of concern.
- 4.2. In summary, I consider the proposal to be unacceptable on the grounds of highway safety. The Appellant has not, and cannot, demonstrate the issues raised can be adequately addressed or mitigated to an acceptable level. The documentation provided to date is inadequate in this regard, does not allay my concerns and therefore the proposal is not supported.
- 4.3. I have identified, within the statutory comments, that key sections of Lancaster Road (including the Vine House bend), and two locations along the A588 (including at 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) simply cannot support the proposal safely. These locations lack the physical carriageway width to enable two-way vehicular movements to safely pass, when an HGV or bus is using the network at the same time as another vehicle, in the instance of the locations along the A588. While

along the full extent of Lancaster Road, two-way HGV movements are not possible. Consequently, such constraints are likely to give rise to unsafe reversing manoeuvres and elevated collision risk, particularly in an environment already characterised by limited forward visibility and constrained alignment.

- 4.4. The limitations of the local highway network are not disputed by the Appellant. In their Response to Highway Authority Consultation Response of 14 February 2025 (May 2025), the Appellant states 'the limitations of the highway network in the vicinity are accurately described by the Highway Authority' (paragraph 7.1). Despite these fundamental limitations the Appellant has not provided deliverable, evidence-based mitigation. Visibility splays at the site access remain unproven; proposed carriageway widening along Lancaster Road is considered unachievable due to hedge root stock, land ownership constraints, and inadequate verge width; and proposed signage solutions at the Vine House bend on Lancaster Road and at two locations along the A588 (Fold House Farm bend and A588 Burned House Lane, B5377 Park Lane and U22436 Cemetery Lane junction) are restricted by insufficient physical space and are unlikely to meaningfully address the underlying safety risks.
- 4.5. The development would also materially worsen conditions for pedestrians, cyclists, and equestrians. The affected routes are already devoid of footways, and the limited verge that currently provides refuge would be lost to attempted widening or habitual overrun. As a result, the proposal would

materially increase vulnerability for non-motorised users on an alignment already known to be substandard.

- 4.6. Furthermore, the Appellant has not supplied a credible or enforceable strategy for managing HGV movements on the surrounding highway network. No proposals are included for the control of vehicle routing, the safe coordination of movements during restricted periods, or the provision of any appropriate off-network waiting facilities for HGVs.
- 4.7. Taking these matters together, the LHA concluded that the development would exacerbate existing highway safety issues, the impacts cannot be effectively mitigated within the highway boundary, and would result in a severe and unacceptable impact on the safe operation of the local highway network, which is contrary to paragraph 116 of the NPPF, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.

## **5. Site Access**

- 5.1. It is proposed the site is accessed via a new priority-controlled junction on the B5270 Lancaster Road, with the junction incorporating a traffic-island arrangement separating the 'in' and 'out' movements, ensuring that HGVs enter and exit the site from the east, directing all HGV traffic to and from the A588. To ensure this access is safe, visibility splays in both directions of 2.4m x 52m are required to ensure that drivers have a safe stopping

- distance. To date no evidence has been provided to demonstrate the necessary visibility splays can be achieved.
- 5.2. The required visibility splays of 2.4m x 52m at the site access are based on the recorded 85th percentile speeds (as set out in the agreed traffic survey dated 6-12th October 2023 within the SoCG) and an allowance for wet-weather conditions. I have calculated the necessary visibility splays utilising paragraph 10.1.5 of Manual for Streets 2 and to allow for wet-weather conditions, I have utilised paragraph 3.1.1 within the Design Manual for Roads and Bridges CA 185 document, which allows for the 85<sup>th</sup> percentile speeds to be deducted by 4kph (or 2.5 mph). This is a standard, industry accepted approach to calculating visibility splays (Appendix 13).
- 5.3. The Appellant disputes using the industry standard method of calculation of the visibility splays, stating "*... 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.*" (Response to Highway Authority Consultation Response of 14 February 2025 document, paragraph 5.6)
- 5.4. Visibility splays do not act as speed enforcement measures; they mitigate highway safety risks and enable drivers to have adequate stopping distances. For 30mph visibility splays to be appropriate, an effective scheme to ensure speed compliance would need to accompany the proposals.

- 5.5. The 85th percentile speeds by design excludes outliers in terms of vehicle speeds along the route. These are in the agreed traffic survey in the SoCG. On 08/10/23 at 2pm, an eastbound speed of  $70 \geq 75$ mph was recorded. Speeds of  $65 \geq 70$ mph were recorded westbound on both the 06/10/23 and 10/12/23, with their times being 1pm and 10pm, respectively. These readings confirm that a proportion of drivers travel significantly faster than the speed limit, and underline why visibility must be based on 85<sup>th</sup> percentile speeds rather than aspirational compliance.
- 5.6. Using a setback distance of 2.4 metres, as recommended in Manual for Streets, minimum visibility splays to the west of the access cannot be achieved to allow vehicles to emerge safely (see Appendix 14).
- 5.7. The visibility splays that are necessary run over third-party land (the hedge) and are therefore outside the control of the Appellant and the Highway Authority. This is not acceptable, as any change to the height of the hedge lies outside the Appellant's control, meaning they cannot deliver the visibility splays required to achieve a safe site access.
- 5.8. The safety issues that this results in include:
- Vehicles at the access not being able to view approaching vehicles and other road users including pedestrians, cyclists and equestrians with the risk of exiting the site into moving traffic;

- Vehicles at the access cannot judge safe gaps within live traffic due to potential obstructions, leading for a greater risk of shunt or side impact collisions occurring; and
- Vehicles must creep into the running lane to obtain a view of oncoming vehicles and road users. This obstructs through traffic and can increase the risk of collisions.

5.9. This is a matter of significant concern, particularly given this access is primarily for HGVs but does generate some levels of non-HGV traffic. Without the minimum vehicular visibility splays of 2.4 metres x 52 metres in both directions a safe and suitable access cannot be provided. This will present an unacceptable highway safety risk, contrary to paragraph 116 of the NPPF, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.

## **6. Highway Issues and Impacts**

6.1. In this section, I first set out the expected vehicle movements generated by the development and the routing proposed by the Appellant. I then assess the existing highway concerns associated with the identified route and the carriageway width required to safely accommodate two-way HGV movements. This is followed by an examination of the Appellant's proposed off-site highway mitigation measures and an assessment of the impacts the development would have on other road users.

6.2. Trip Generation and Site Traffic Routing

6.3. The development will generate up to 120 two-way HGV movements per day during its operational hours (07:00–18:00 Monday to Friday and 07:00–13:00 on Saturdays).

*NOTE: Although, the updated Transport Statement (December 2024) relied on the average number of HGV movements (74 two-way movements) when assessing the impact the proposal will have on the local highway network.*

6.4. All HGV movements associated with the site will be routed to and from the B5270 Lancaster Road/A588 junction. The Appellant suggests that these movements would then be split at the junction, with approximately 60 HGVs travelling to/from the east and 60 HGVs travelling to/from the south along the A588, before dispersing onto the wider highway network.

6.5. With regard to staffing levels, the Appellant has confirmed that up to 11 operatives are expected to be on site at any one time. On this basis, it is expected that the development would generate approximately 22 two-way operative movements per day, with the majority of these trips likely to follow the same route as the proposed HGV movements. Although, operatives will have the option to travel to and from the west of the proposed site access.

6.6. Existing constrains along the A588

6.7. In this section, I set out the evidence explaining why the proposed intensification of use by HGV traffic along the A588 as a result of the development is of significant concern to the LHA. These concerns are based on observed issues (photographs as per table 1 below) along the route, and the key matters identified are as follows:

- Insufficient forward visibility
- Narrow carriageway
- Loss of carriageway edge support
- Vehicle damage to third party boundary walls
- Damage to traffic signage
- Lack of lane discipline
- Verge overrun

Photograph Reference	Description	Location
12	Verge overrun	Opposite Bourbles Lane/ A588 junction
13	Verge overrun	Adjacent to Green Dicks Lane/ A588 junction
14	Damaged verge marker posts	Adjacent the access serving P&R Lambert Timer
15	Carriageway edge deterioration/ pooling	Adjacent to the access serving Heyswood House
16	Verge overrun	Opposite Street Lighting Column Unit 30

17	Verge overrun	Adjacent to the access serving Foxwood
18	Damaged chevron sign	Adjacent to the access serving Fold House Farm
19	Damaged wall protector	Adjacent to the access serving Fold House Farm
21	Overrun close to Fold House Farm wall	Adjacent to access serving Fold House Farm
22	HGV not maintaining lane discipline	Opposite the access serving Fold House Farm
23	Verge overrun at bend in road/ damage to verge marker posts	Opposite the access serving Fold House Farm
24	HGV negotiating bend and car stopping	Adjacent to the access serving Fold House Farm
25	HGV not maintaining lane discipline	Adjacent to the access serving Fold House Farm
26	HGV entering bend	Adjacent to the access serving Foxwood
27	Verge overrun	Opposite the access serving Lancaster's Farm access
28	Verge overrun	Adjacent to the access serving Springfield House Farm
29	HGV not maintaining lane discipline to negotiate the bend	A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction
30	HGV not maintaining lane discipline to negotiate the bend	A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction
31	HGV not maintaining lane discipline to negotiate the bend	A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction

*Table 1: Selected pictures from Appendix 8, which illustrates the existing highway constraints located along the A588.*

- 6.8. **Carriageway too narrow to accommodate two-way vehicular movements.** At two areas along the A588 two-way vehicular movements are not possible when an HGV or bus is using the network. These 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.

Near the access serving Fold House Farm, the carriageway cannot support two-way vehicular movements, when an HGV or bus is using the network causing vehicles to wait or reverse when HGVs pass (Photograph 24 and 25), in a location which is constrained by **insufficient forward visibility** due to the horizontal alignment of the carriageway (Photograph 22).

Evidence of **vehicle damage to third party boundary walls** (Photograph 19) and **traffic signage** (Photograph 18 and 23) also questions the suitability of the route following the proposed intensification of use, with a further 60 HGVs expected to use this route each day.

At the A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction, two-way vehicular movements along the A588 are not possible without conflict with **lane discipline unable to be maintained** (Photographs 29-31). This is in a location which is constrained by **insufficient forward visibility** due to the horizontal alignment of the carriageway (90-degree bend) and two detached dwellings obstructing the view of the carriageway ahead. As stated within the Stage 1 Road Safety

Audit (Appendix 15), "*this is in a location where large vehicle movements necessitate encroaching into the opposing carriageway therefore the existing issues at this location may be exacerbated by increased potential for large vehicles to meet each other at the bend*". To date, four personal injury collisions have been recorded in the last five years, two of which involved an HGV, including one collision between an HGV and a pedestrian.

*NOTE: In Appendix 12, I have provided a study which showcases the existing carriageway width at both these locations, with measurements being taken at 10 metre intervals.*

- 6.9. **Verge overrun-** In multiple locations along the A588, verge overrun has been evidenced. Verge overrun occurs where vehicles are forced to leave the carriageway extents and encroach onto the adjacent verge due to insufficient carriageway width to support two-way vehicular movements.
- 6.10. **Loss of carriageway edge support-** Approximately 130 metres from the access serving Fold House Farm, there is clear evidence of vehicle overrun, which has caused the edge of the carriageway to break away. This damage has been caused by vehicles overrunning the verge and travelling beyond the constructed carriageway extents.

- 6.11. **Damage to traffic signage-** In multiple locations along the A588, there are examples of damage to traffic signage and verge marker posts indicating vehicle strikes.
- 6.12. In my view, these existing deficiencies demonstrate that the A588 is highly sensitive to any further intensification of use by HGV movements.
- 6.13. Necessary Carriageway Width
- 6.14. A significant contributor to the issues set out above is inadequate carriageway width. The A588 is historic in design and age, and not adherent to modern design standards. This also explains the lack of provision for sustainable users.
- 6.15. For a carriageway to accommodate two-way HGV movements, along straight sections of road **only** (Appendix 16), the carriageway should be a minimum of 6.2 metres wide. This allows a 100mm clearance between passing HGVs (3.05m in width including door mirrors).
- 6.16. It should be noted that in terms of highway design, UK design standards require engineering judgement – that is, consideration of design speeds; traffic levels; traffic composition; curvature; gradients; character; sustainable provision; etc. In essence, 6.2 metres is a minimum which does not include provision for these other considerations. When these other considerations are included, the LHA's concern about intensification of

- existing movements and exacerbation of existing issues on the local highway network is clearly justified, especially when there is a realistic prospect of two development-related HGVs meeting along these constrained sections where they cannot pass.
- 6.17. This has highway safety implications as this proposal will increase conflict and subsequently the number of occurrences where HGVs will be required to reverse on the live network to allow another HGV or vehicle 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.
- 6.18. There are two main approaches when it comes to addressing this.
- 6.19. The first approach is to rectify the lack of width where routes are too narrow to accommodate opposing HGV movements, as recommended in the Road Safety Audit (Appendix 15).
- 6.20. The second approach, where insufficient width cannot be rectified, is to ensure that drivers have adequate forward visibility to a clear and safe passing place. This requires passing places to be positioned so that there is suitable intervisibility between them, allowing drivers to see whether the route ahead is clear and to avoid situations where reversing becomes necessary. Appropriate signing is also essential to ensure that all highway

users are aware of the passing arrangements and can navigate the route safely.

6.21. Parts of these approaches have been proposed by the Appellant along Lancaster Road and the A588 but in my opinion, with limited benefit in mitigating the risk of two-HGVs conflicting along the route.

6.22. Proposed Carriageway Widening along Lancaster Road

6.23. Along Lancaster Road, as shown within Appendix 3 (Turner Lowe drawing number 220503/03/C), the Appellant proposes to widen the carriageway by approximately 0.3 metres on both sides of the existing carriageway to the east of the site access, where achievable. This is except adjacent to street lighting column 122 which is located approximately 140 metres from the site access, where limited widening for a 25 metre section along the northern and southern sections of Lancaster Road have been proposed, as shown on the drawing.

6.24. Whilst the principle of the proposed widening works is supported, there are significant issues with the Appellant's approach. No evidence has been provided to demonstrate the deliverability of the widening scheme, despite this being fundamental to its effectiveness. The Appellant proposes to utilise the available verge, defined as the distance between the edge of the carriageway and the start of the hedge (root stock), to accommodate the additional carriageway width.

- 6.25. However, the distance between the edge of the carriageway and the start of the hedge along the length of Lancaster Road is variable and so there is no guarantee without further investigations being undertaken, that these widening works can be delivered within the highway extents, given the existing constraints associated with the available verge and third-party land.
- 6.26. Even if the Appellant provided the relevant information to showcase the feasibility of the scheme which proved to be acceptable, I would still raise highway safety concerns associated with the scheme and the use of Lancaster Road for the development. This is because two-way HGV movements, even when regard is had to the proposed widening of the carriageway, cannot occur along the full extents of Lancaster Road, as stated within the Stage 1 Road Safety Audit (see Appendix 15). This not only includes the Vine House bend, as recognised by the Appellants Transport Consultant (Updated Transport Statement paragraph 4.12) where a signage strategy has been proposed but also along the majority of Lancaster Road.
- 6.27. In my statutory comments (Appendix 1 and Appendix 2), I requested that the Appellant provides swept path drawings for both the articulated tipper and rigid tipper vehicles used in their assessment, with door mirrors included. This is essential to ensure that the full operational width of each vehicle is represented (as discussed above), allowing a robust assessment of whether Lancaster Road can safely accommodate two-way HGV

- movements. However, the Appellant has not provided any swept-path drawings that include the tracked width of the vehicles' door mirrors.
- 6.28. Even without the inclusion of door mirrors, the Appellant's swept path drawings show that both HGV types would be required to track along the very edge of the carriageway should two-way HGV movements be occurring. In practice, this is highly unlikely, as doing so would place vehicles in direct conflict with the adjacent hedge line, which will encroach into the carriageway during hedge growing season further restricting the effective width of Lancaster Road. It would also bring vehicles into conflict with existing street infrastructure, including street lighting columns which will need to be relocated and the proposed traffic signs, as stated within the Stage 1 Road Safety Audit.
- 6.29. Such conflicts would inevitably result in damage to vehicles and roadside infrastructure, leading to debris, such as branches, twigs, vehicle components (e.g. door mirrors, trim), and damaged sign plates, being deposited on the carriageway. This would be to the detriment of highway safety and would pose an increased risk to all road users.
- 6.30. In practice, to prevent any conflict with the hedge and street infrastructure, HGVs are likely to be off-set from the edge of the carriageway which will narrow the true width of Lancaster Road and will cause lane discipline to not be maintained. This would cause conflicts to occur should the carriageway be accommodating two-way HGV movements. These conflicts

- would 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.
- 6.31. Reversing movements on the highway increases the risk of collisions occurring especially if the reversing movements are involving HGV's as evidenced within paragraph 6.8.8 within Manual for Streets 1 which states "*reversing causes a disproportionately large number of moving vehicle accidents in the waste/recycling industry*". 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 currently provides some but limited protection from vehicular traffic for pedestrian or equestrian use.
- 6.32. 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.
- 6.33. In Appendix 17, I have provided swept path drawings that include the door mirrors of the tracked vehicles. Drawing 1 shows the 13.9 metre tipper truck used by the Appellant while drawing 2 and 3 shows a maximum UK legal length articulated vehicle (16.5m long) using Lancaster Road and drawing 4 and 5 shows a tractor and HGV using Lancaster Road.

- 6.34. A maximum UK legal articulated vehicle has been used because larger articulated tipper vehicles, than the one used by the Appellant within the swept path drawings, are available in the UK. Examples of these include Heidelberg Materials' Aggregates Articulated Tipper (14.2m length and 3.0m width including door mirrors) and MQPs Articulated Tipper (14.2m length and 3.0m width including door mirrors) (See Appendix 18). Therefore, given that the Appellant could use larger vehicles than the ones provided on their swept path drawings (Appendix 3) and to consider any larger vehicle accessing the site or traversing the road, a maximum UK legal length articulated vehicle has been tracked.
- 6.35. As shown on all the drawings I have produced but to use Drawing 1 (Appendix 17) as an example, the swept path of the HGV (Tipper Trucks) demonstrates that along most of Lancaster Road, they would require greater width than the proposed widened carriageway would afford, should two-way HGV movements occur simultaneously. This would place vehicles in direct conflict with the hedge, street furniture (including relocated lighting columns), and encroach upon third-party land, with door mirrors also oversailing third-party land outside the control of the Highway Authority and the Appellant.
- 6.36. Conflict would also occur in the centre of the carriageway, as there are sections, such as between the gated access to Hillfield House and the access to Pointer Cottage, where opposing HGVs overlap for approximately 100 metres. This conflict zone is further exacerbated by poor forward

- visibility (Appendix 14) resulting from the horizontal alignment of Lancaster Road.
- 6.37. These conflicts would 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, leading to the concerns raised above which would be at the detriment of highway safety.
- 6.38. There are also areas where widening cannot be delivered but would be necessary. Limited widening is proposed adjacent to the access serving Vine House (145 metres to the east of the site access), where two-way HGV movements are not possible. This issue is cited in paragraph 4.12 of the Updated Transport Statement. A collision involving a bus and a car travelling in opposite directions has been recorded within the last five years and there have been instances of "near misses," as identified on Photograph 10 within Appendix 8 between an HGV and a Bus.
- 6.39. Therefore, for the reasons set out in this section, it is my professional opinion that even if Lancaster Road were widened by the full 0.6 metres, two-way HGV movements still could not be achieved along its full length. With the proposed intensification of the route, amounting to up to 120 HGV movements per day and the existing HGV movements which already occur along Lancaster Road, the likelihood of two HGVs meeting at locations where passing is not possible would increase significantly. This would

inevitably result in reversing manoeuvres on the live highway network to avoid conflict, creating an unacceptable risk to highway safety.

6.40. Proposed signage along Lancaster Road and the A588

6.41. The proposed development is seeking to provide signage in the vicinity of the access serving Vine House, along Lancaster Road (located approximately 140 metres east of the site access) and at two locations along the A588 which include the Fold House Farm bend (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). These proposals are shown within Appendix 3 and are also highlighted within the Appellants document titled "Supplementary Information Note: Queries Raised by Highway Authority January 2025."

6.42. The proposed signage must comply with local and national guidance, including Lancashire County Council's own document which is titled "Code of Practice on the Control of the Placing of Items within the Highway (Rev 0, 04/97)", which states that signs must not be obstructive and must not encroach within 0.5 metres of the carriageway edge. These standards exist to prevent vehicle strikes, ensure visibility, and protect vulnerable road users. The signs also need to be within the highway extents, unless a suitable legal agreement can be reached with the landowner as stated within paragraph 3.3.2 of the national document titled "Traffic Signs Manual

Chapter 1". The proposals do not comply with the County Council's requirements for the following reasons.

- 6.43. At the Vine House bend the Appellant has proposed to place "Road Narrows" and "Oncoming Vehicles in Middle of Road" signs on both approaches.
- 6.44. On the eastern approach these signs, as shown within Appendix 3 (Turner Lowe drawing number 220503/03/C), are proposed to be provided on the existing street lighting column (Unit 122). The Appellant in Supplementary Information Note: Queries Raised by Highway Authority January 2025 claims that 900 mm of verge is available in this location (paragraph 2.9). This is contrary to Turner Lowe drawing number 220503/03/C which shows that the verge width is only 300 mm. Therefore, a 600 mm sign plate cannot be accommodated without protruding into third party land and the carriageway, creating an obstruction at a location already unable to support two-way HGV movements, as recognised by the Appellant's own admission (Updated Transport Statement paragraph 4.12). This presents a further highway safety concern, where the sign would be in danger of vehicle strikes as stated within the Stage 1 Road Safety Audit (Appendix 15).
- 6.45. Along the western section of the Vine House bend, the same signs as along the eastern section would be provided. Within paragraph 2.11 of the document titled "Supplementary Information Note: Queries Raised by

Highway Authority January 2025, "*these will be provided within the verge which is around 900mm.*" However, no evidence has been provided to substantiate the width of the verge and given that the Appellant proposes only 0.3 metres of carriageway widening in this location, a 600 mm sign would not achieve the necessary clearance. The sign would therefore be vulnerable to vehicle strikes, leading to the issues raised above and as shown within my swept path drawings (Appendix 17), HGVs will conflict with the signpost given HGVs are shown to go beyond the carriageway edge.

- 6.46. Along the A588, no scaled drawings have been provided showing the location of the proposed traffic signs at the Fold House Farm bend and at the Burned House Lane junction. Indicative locations, within the document titled "Supplementary Information Note: Queries Raised by Highway Authority January 2025," have instead been provided with "Road Narrows" and "Oncoming vehicles in middle of road" signs being proposed in both locations.
- 6.47. Despite this, similar issues to the signs proposed along the Vine House bend have been identified, with the indicative signage including the posts encroaching within 0.5 metres of the carriageway edge (excluding the proposed eastbound sign for the Burned House Lane junction which is provided on an existing footway adjacent to the dwelling Preesall Park Fold). This occurs along parts of the local highway network already prone to

verge overrun, such as at the Fold House Farm bend (Photograph 31, Appendix 8), where there is also evidence of damage to existing traffic signage, as shown in Photographs 18 and 23 of Appendix 8 and noted in the Stage 1 Road Safety Audit (Appendix 15), with damage to traffic signage being a common occurrence along the A588. The proposed signage strategy, as a result, would introduce an additional roadside obstruction.

6.48. Even if adequate space for these traffic signs could be provided within the highway extents, with sign faces at a distance of 0.5 metres from the edge of the carriageway to comply with guidance, the traffic signs would only warn users of the risk rather than mitigate against it. Conflict will still lead to HGVs having to reverse in these locations to allow two-way HGV and two-way vehicular movements to occur in locations, with the exception of the Fold House farm bend (although damage to third party land and existing signage has been presented within Section 6.6), where collisions involving HGVs in the last five years have been recorded. The number of reversing movements by HGVs following the proposal, is likely to be intensified leading to a greater propensity for collisions to occur in these locations.

6.49. Servicing Management Plan

6.50. The Appellant has proposed traffic management measures intended to control their own HGV movements along Lancaster Road. These include

prohibiting all HGVs from entering or exiting the site during traditional school pick up and drop off times (0800–0900 and 1500–1600). They are also proposing to manage their own HGV movements along Lancaster Road, to prevent any instances where two development related HGVs will meet along this section of the route.

- 6.51. However, I question the feasibility, practicality, and enforceability of these measures. In the case of restricting HGV movements during traditional school pick up and drop off periods, no information has been provided to explain how this would be managed in practice, nor has any evidence been submitted to identify where one or more HGVs travelling to or from the site could suitably, conveniently, and safely wait during these restricted periods. This is despite such information being requested within my statutory comments (Appendices 1 and 2).
- 6.52. I am concerned that there does not appear to be any suitable locations on the local highway network where development-related HGVs could wait without creating a highway safety risk for other road users. This is along a route which, as set out in Section 6.6, is already sensitive to any further intensification of HGV movements. Without the provision of appropriate waiting areas, the proposed measure would risk making the existing highway situation materially worse, as HGV drivers may resort to unsuitable or unsafe locations in order to comply with the restriction.

- 6.53. In regards to preventing two HGVs to and from the site meeting along Lancaster Road, no details have been submitted regarding how the Site Manager will control HGV movements travelling towards the site. This will prove difficult to manage given the number of vehicles involved and the Site Manager having no total control over development related HGVs travelling towards the site, leading to two development related HGVs meeting along Lancaster Road.
- 6.54. The Site Manager is also unable to control other HGV and large vehicle movements along Lancaster Road and subsequent conflict with existing traffic on the network. Therefore, in my view, these traffic management measures proposed by the Appellant are not considered to meet the tests within Policy DM2 of the Lancashire Minerals and Waste Local Plan as the impacts are not capable of being eliminated or reduced to acceptable levels.
- 6.55. Even if these measures could be presented as being feasible, practical and enforceable, the site is unable to control other movements along the route and there are no measures proposed to control development related movements along the A588. Despite, there being two identified locations (Fold House Farm bend and A588 Burned House Lane/B5377 Park Lane/U22436 Cemetery Lane junction) where two-way HGV movements are not possible without conflict, as raised in Section 6.6. Given the volume of movements proposed (60 HGV movements per day in both locations), which may be higher due to the enforceability issues associated with

restricting vehicular movements, there is a significant risk on a daily and hourly basis that two HGVs related to the development could meet in these locations. This would lead to an unacceptable impact upon highway safety due to there being a higher propensity for collisions to occur.

6.56. Impact on other road users

6.57. There is clear evidence, as demonstrated within Appendix 8 and as described within Section 2, that non-motorised users such as pedestrians, cyclists and equestrians use the route proposed.

6.58. Even though it is evident that movements by sustainable (vulnerable) road users occur along the local highway network no impact assessment has been undertaken by the Appellant to determine the quantum of users, and no suitable mitigation has been proposed protecting them, especially when regard is had to equestrian movements.

6.59. In fact, widening the carriageway along Lancaster Road will 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 in the previous section.

6.60. This is not compliant with paragraph 117 c) of the NPPF which states that:

*"117. Within this context, applications for development should:*

*c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.*

- 6.61. It is my view therefore that the proposals make matters materially worse for pedestrians, cyclists, and equestrians.
- 6.62. The proposals also increase the risk of further collisions occurring along the A588, due to there being limited pedestrian segregation or 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.
- 6.63. I am therefore concerned that any planned intensification of HGV usage on the local highway network alongside a lack of meaningful mitigation measures, could discourage sustainable road users from using the network and / or will increase the likelihood of an incident with a sustainable user.

## **7. Conclusion**

- 7.1. This section sets out my conclusions with consideration for the assessment of the highway and transport impact of the site, the appropriateness of the access routes and the mitigation proposed.
- 7.2. In my evidence, I have demonstrated that the proposed HGV routing strategy, via Lancaster Road and the A588, is fundamentally unsuitable to

- accommodate the significant intensification of HGV movements associated with the development.
- 7.3. The A588 in particular already exhibits multiple, well-documented deficiencies. The key issues include insufficient forward visibility, inadequate carriageway width, verge overrun, loss of carriageway edge support, repeated vehicle strikes on boundary walls and traffic signs, and locations where HGVs are unable to maintain lane discipline. These issues are not hypothetical; they are occurring under existing traffic conditions and are evidenced extensively within Appendix 8.
- 7.4. The Appellant has recognised the existing constraints associated with the carriageway width along Lancaster Road and so has proposed to widen the carriageway by 0.6 metres to the east of the proposed site access, where achievable.
- 7.5. However, the widening proposals are unproven in terms of deliverability and, even if achievable, would not provide sufficient width to enable safe two-way HGV movements along the full length of Lancaster Road, and be at the detriment of other road users. The Appellant's own swept path drawings, even without door mirrors, demonstrate that HGVs would be forced along the edge of the carriageway, placing them in conflict with road users, hedges, street furniture, third-party land, and opposing vehicles.

- 7.6. My own swept path analysis (Appendix 17), which includes door mirrors of the HGVs, confirms that two-way HGV movements cannot be safely accommodated along the full length of Lancaster Road without conflicts occurring. For example, as shown on drawing 1 (Appendix 17), there is a 100 metre conflict zone between the gated access to Hillfield House and the access serving Pointer Cottage, where opposing HGVs overlap. This conflict zone is further exacerbated by poor forward visibility resulting from the horizontal alignment of Lancaster Road, and by the fact that HGVs would be required to encroach even further onto third-party land beyond the proposed new carriageway edge.
- 7.7. Limited widening has been proposed at the Vine House bend located along Lancaster Road. The Appellant has acknowledged that two-way HGV movements are not possible in this location and so has provided a signage strategy to warn users of the highway constraints. However, there is a lack of highway space to locate the proposed signs at a suitable setback distance of 0.5m from the edge of the carriageway, given the constraints associated with the available verge and third-party land, leading to prospective signs protruding into the carriageway and third party land, which will add an additional obstruction on both sides of Lancaster Road. This in a location where two-way HGV movements are not possible without conflict.
- 7.8. 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 passing location along the carriageway. This has highway safety implications not only for other vehicles but also for the most vulnerable road users including pedestrians, cyclists and equestrians who are known to travel in the area.

7.9. Having regard to pedestrian needs, there are no footways and following the proposed 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.

7.10. Pedestrians walking in the carriageway along with HGVs 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. Conflicting with Paragraph 116 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan. 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.

7.11. Signage has also been proposed along the A588 at two locations, which include the Fold House Farm bend located to the east and A588 Burned

House Lane, B5377 Park Lane and U22436 Cemetery Lane junction located to the south of the A588/ Lancaster Road junction. Similar to the signage proposed along Lancaster Road, there is a lack of suitable highway space to locate the proposed signs, introducing additional roadside obstructions in locations which are already prone to verge overrun. Providing traffic signage does not mitigate the fundamental problem: HGVs will still meet at points where passing is not possible. This will lead to an increased frequency of reversing manoeuvres on a live highway with limited footways, limited segregation for vulnerable users, and constrained visibility. Such manoeuvres present a clear and unacceptable risk to pedestrians, cyclists, equestrians, and other motorists.

7.12. The Servicing Management Plan also fails to provide a credible mechanism for preventing HGV conflicts. The Site Manager cannot control other HGV movements, nor has the Appellant identified safe waiting locations for vehicles arriving during restricted periods or has identified how development related HGVs will be controlled to prevent them meeting along Lancaster Road.

7.13. Taking these matters together, along with the access not being able to provide vehicular visibility splays of 2.4 metres x 52 metres to the west of the site access without conflicting with third party land, the LHA concludes that the development would exacerbate existing highway safety issues, cannot be effectively mitigated within the highway boundary, and would result in an unacceptable impact on safety.

7.14. It is concluded therefore that the development should be refused on transport grounds, with the development as stated within Reason for Refusal 1 (Appendix 4), having an unacceptable impacts on highway safety which cannot be adequately mitigated and therefore conflicts with Paragraph 116 of the National Planning Policy Framework, Policy DM2 of the Joint Lancashire Minerals and Waste Local Plan and Policy CDMP6 of the Wyre Local Plan.