

**Planning ref LCC/2023/0030 Sand and Gravel Extraction Bourbles Farm,
Bourbles Lane, Presall**

**Lancaster Road Quarry Boundary Residents Association
Objection to the revised Transport Statement of December 2024**

Lancaster Road



A588



Fold House Corner A588 pre repair



Purpose and scope of response

We are submitting this objection to the revised Transport Statement dated December 2024 for the above proposed development, as members of the Lancaster Road Quarry Boundary Residents Association.

As in our original objection we assert that unsuitable roads are being used, that the HGV movements associated with the development would lead to loss of highway amenity. This is both to users of primary and local network and to the highways amenity of our residential properties adjacent to the site, for the duration of the development, contrary to the Joint Lancashire Minerals and Waste Local Plan, the NPPF and The Wyre Local Plan.

We request that all our points in our original objection that remain relevant to the updated statement stay under consideration.

Summary of Key Points in this Objection:

- The data provided by the developers throughout their updated Transport Statement varies widely and contradicts itself which we will point out in detail throughout this response. These inaccuracies **undermine the reliability of the revised statement and skew the conclusions drawn.**
- We calculate that there will be **75 HGV movements** traversing the A588 and B5270 Lancaster Road **daily** during opening hours and the calculations for this can be found in Section 3 below. Despite many contradictory references to traffic counts, on scrutiny the developers do eventually show a similar figure of 74 HGV movements daily (see bottom of their Page 11).
- We will contend that mitigation factors such as **controlling traffic flow is unachievable**, as the site cannot control all traffic —only the traffic directly associated with the site, and even that is questionable
- The suggested road widening is based on encroaching onto land owned by Lancaster Road residents, and as such would constitute an **unauthorised encroachment and trespass** under property law, which the residents are contesting.
- The required **visibility splays cannot be achieved** without the proposed cutting of hedges and encroachment onto land outside of the developers ownership. They do not have the legal right to maintain these hedges in a manner that would achieve the

minimum visibility splay **required to meet legal highway safety standards.**

- Notwithstanding the trespass issue above, **the road widening suggested is not achievable along the full length of the road** and in particular at accident hotspots, as fixed property boundaries border the tarmac.
- In Section 5, the figures presented, particularly those related to road safety, are obscured by the developers' use of the phrase "**either side of Lancaster Road.**" As this is related to the A588, this **diverts attention from the B5270**, where there is no information, and the relevant **thresholds are exceeded**. This misleads the reader, as will be demonstrated in this objection.
- Relevant to the point above, this development will create an **over 30% material increase** of heavy goods vehicles on the B5270 Lancaster Road and **12% on the A588**.
- As an HGV is 3 metres or more, wing mirror to wing mirror, the proposed unrealistic widening of Lancaster Road, **still does not allow for safe passage of two HGVs** along the full stretch. Without any widening they cannot pass safely on any part of the road, other than the entrance to Lancaster Road itself.
- The already **significant safety risk** to vulnerable road users, in particular pedestrians, cyclists and horse riders, has not been addressed. Indeed, if the road widening encroachment went ahead, this would actually **increase the safety risk**.
- The up-dated statement acknowledges **HGVs will come over the centre line on the B5270** at the Vine House bend. The mitigation factors do not remove this issue and indeed the warnings signs themselves to highlight the issue **are insufficient** and will **encroach into the highway causing further road narrowing**.
- The Sensitive Location Assessment is inadequate - misleading at best and inaccurate at worst. There are **Sensitive Receptors on Lancaster Road in particular which have been ignored**. (See 5.i below)
- The revised statement repeatedly references the impact on the A588 whilst **downplaying and/or ignoring the impact on the B5270**.
- The **A588** is an accident hotspot - **regarded as one of the most dangerous roads in Britain**. We will provide extensive historic and recent accident data, including in the last 3 months alone, 3 accidents which the police attended, the A588 was closed and traffic diverted. Demonstrating that despite various traffic calming measures

this assertion remains valid.

- The provision of figures and thresholds given on both the A588 and B5270 **are inaccurate**. Photos in Appendix B using wide angled lens and repeatedly showing the use of what appears to be a tiny white Datcha Sandero Stepway with a width of **1850mm wide as opposed to an HGV which is 3m wing mirror to wing mirror** is not representative of the impact being addressed nor the impact on sensitive receptors.

We will now review the updated Transport Statement in detail, addressing each item sequentially. This approach may result in some repetition, but we feel it is essential to address each item.

1. Introduction

- 1.2 References Bourbles Farm on Bourbles Lane, Pilling. The scheme is actually based in Preesall, not Pilling.
- 1.5 States that the new access road is on the boundary of Pointer Farm. This is incorrect as Pointer Farm was split in 2003. The land that the access road is on the boundary of is Hillfield House.
- 1.6 Our original objection addresses the availability of minerals at other locations and we would request that this remains under consideration.
- 1.6 The statement claims that highway improvements along Lancaster Road will ensure safe passage of HGVs. However, many of the proposed measures are unachievable, and we will provide information demonstrating that safe passage for HGVs will remain unfeasible. Furthermore, the proposed road widening would significantly increase risks to vulnerable road users, including pedestrians, cyclists, and horse riders, as highlighted in our original objection.

The cluster of 7 properties on the B5270 route (Pointer House, Vine House, Pointer Farm, Pointer Cottage, Hillfield House, The Hayloft, Turbo Rebuild) that **all** HGVs will traverse, have residents who are non-car drivers and use the route daily to access the village shops and bus stops. Children in these residences including children from Hillfield House who are registered foster carers, need to walk to school daily, walk to the bus stop at Head Dyke or Cart Gate to get to college or walk into the village to meet friends. The width of the road with additional vehicles and without even the slightest verge will be treacherous.

- 1.7 Refers to the inconvenience to other highway users and local residents would be over a 5-year period. The original submission stated a period of 6 years (followed by restoration). This reduction in years would increase the volume of traffic in that period and therefore have a greater negative impact.

2. Local Highway Network Details

- 2.10/11 Refers to landowners on the A588 indicating they do not wish to be part of the development. This is of interest as the landowner on the A588 is already part of the development as they have entered into a legal agreement with the developers to use their land at the rear of their property for extraction and infill. One presumes rather than not wanting to be involved in the development, they do not wish to have the extensive amount of HGV vehicles impacting their daily lives for 7 years, the same as the residents on Lancaster Road.
- 2.12 Refers to agreement being reached with the landowner to sell the land for the new access road. This suggests support for the development which is certainly not the case. This land was put under a legal option to purchase through misrepresentation at the end of 2020. The landowners (Hardings) at that time were told throughout the reluctant discussion period of two years that this land was to access fishing lakes. However, from 2018 work was already underway between the Holden family and the Baxter group, checking the area for sand and gravel. As such the buyer, Holdens, negotiated the sale under the full knowledge that it was for access to a quarry. On the day of completion in 2022 that very same day the land was sold on from Holden's to the Baxter Group.

We believe the approach of those involved in this development, to purchasing this land, raises serious concerns about their future conduct and operational integrity.

- 2.13 States that to 'ensure HGV traffic cannot turn right to travel west to Knott End as the access has been designed to make this a physically impossible manoeuvre'. It does not highlight how that could be enforced, instead leaves it to 'after' planning permission is gained and to form part of the CEMP. It is extremely questionable how this could be enforced at a junction that is already fraught with challenges and therefore needs to be proven to be feasible **prior** to planning permission being granted.
- 2.15 States (albeit incorrectly referencing the B270 instead of the B5270) that there are no footpaths, only narrow verges. This is correct that there are no footpaths, but the road boundary varies with many places having **no verge** at all. It also states it has a low hedgerow. Again, this varies with various heights of hedgerow

along the entire length. The photo provided to illustrate this point shows only the west side of the entrance.

The developers' upper photo on page 7 states the entrance is opposite an existing access – this is misleading as the entrance is offset and is past the entrance on the other side. We would also highlight that although it shows the fence on the right-hand side set back off the road, this was purposely set back by the owners of Turbo Rebuild, in order to improve visibility of vehicles entering and leaving their property. As highlighted in our summary this is not land available to the developers.

- 2.16 It states the road bends slightly before meeting the A588. This is inaccurate as this is a blind bend for a car driver if you are heading east to the A588 and you are unable to see oncoming cars.

The 2nd photo on page 8 also shows a further blind bend as you are unable to see around the bend to the left until you are in line with the Pointer Cottage entrance on the right.

Furthermore, a car exiting Lancaster Road towards Burned House Lane has an additional blind spot as they are unable to see oncoming traffic beyond a few yards due to the hedging on the bend necessitating the driver to make a hurried exit.

- 2.18 Bus information supplied is again incorrect as it was in the original submission. There are in fact two buses, an 88 and 89 operating the route from Lancaster to Knott End and returning to Lancaster daily. This accounts for 20 bus movements within the opening hours on the Lancaster Road route. The times of the buses are also incorrect as they vary throughout the day depending on route i.e. if Garstang is included in the route. Therefore, it is not purely a 90 min frequency (one way) the actual frequency ranges from a 30 min gap to a 90 min gap depending on the scheduled bus route.

It is neither safe nor practical for employees to rely on the bus to commute to work. The nearest bus stop is located on Head Dyke Lane, requiring employees to navigate the entire length of this road, which is heavily trafficked by HGVs, without the safety of a footpath. During the winter months, this journey would be especially hazardous, as it would take place in darkness.

While the developers have indicated that excavation activities are unlikely to occur during winter, they have also confirmed plans to stockpile materials, ensuring year-round HGV movement. Additionally, the access road to the site lacks both footpaths and lighting, rendering it highly unsafe for pedestrians.

Suggesting employees could use this route on foot is both unrealistic and dangerous.

Furthermore, it is pertinent to note that planning consent in 2024 for a residential property at the Ranch House application no. 24/00147/FUL - located less than 100 metres from the Lancaster Road junction and along the same route proposed for HGV and pedestrian access, was refused planning permission by Wyre Borough Council. The refusal cited several significant grounds, including:

- The poorly accessible location.
- Access via unlit rural roads subject to the national speed limit and lacking footpaths.
- A reliance on motor vehicles for future occupants due to the unsustainable and inaccessible location.
- The proposal is contrary to the National Planning Policy Framework (NPPF), particularly paragraphs 8 and 108, as well as Policies SP1, SP2, and CDMP6 of the adopted Wyre Local Plan.

If such concerns were deemed sufficient to refuse planning permission for a single residential property, they are undoubtedly magnified in the context of this larger development.

- 2.19 Incorrectly refers to several businesses located along the length of Lancaster Road used by HGVs and PSVs. There are two businesses; Turbo Rebuild which only has van deliveries and a cattery which does not have HGVs or PSVs attending. There are no other businesses along this stretch. Therefore, the only PSVs are the buses referred to in 2.18 and the school buses.
- 2.21 Refers to the A588 being a wide single carriageway in the vicinity of Lancaster Road. It fails to mention that the junction is on a 70-degree bend.
- 2.23 Refers to the condition of the B5270 Lancaster Road and how this would be addressed. The road was resurfaced in mid-2022 following severe damage that had caused numerous vehicle issues. An FOI request revealed 112 complaints about road quality between April 2017 and mid-2022 for the 230m stretch from Head Dyke Lane/Burned House Lane junction to the Turbo Rebuild business, including 16 reports of vehicle damage and 4 damage claims.

This figure likely underrepresents the true extent of the problem, as many issues go unreported. Despite the resurfacing, significant erosion appeared within months and has been reported to the local council. Furthermore, the drain has had to be re-sited twice due to it collapsing.



With the proposed introduction of 75 HGV movements daily, without very frequent maintenance, the road is going to deteriorate again into the deep potholes that previously caused complaints and, as has been reported, damage to the properties close to the road caused by the shaking.

The developers state that the CEMP will include a review process, with regular reviews every three months during operation. However, given the road's soft edges and the impracticality of firm edging due to width constraints, the requirement for more frequent repairs would be unavoidable with increased HGV traffic. These repairs would pose significant challenges, requiring either road closures or traffic disruption, as there are no alternative routes. Furthermore, the road's history of flooding-related closures adds to the problem.

As point 2.12, the landowner did not agree to sell the land to the local councillor for a quarry access and according to the developers' proposals it is not temporary as stated, as there is a proposal for permanent usage.

- 2.25 There is **nothing in this update** that will minimise inconvenience and safety concerns for the residents and other road users – quite the opposite.

3. Effects of Proposed Development

Following a detailed review of Section 3, "Effects of Proposed Development" (pages 11 to 15), we have identified significant inaccuracies and contradictions. These issues pertain to the calculation of vehicle movements, the alignment of proposed timings with actual road usage and school traffic schedules, and the resulting impact on heavy vehicle traffic percentages. Our findings challenge the validity of the developers' claims and highlight the potential for greater disruption and safety risks than acknowledged in the statement. The key points of our analysis are outlined below.

Vehicle movements

Based on the figures given by the developers, we have calculated vehicle movements as follows:

Sand and gravel extraction		Comments
Tonnes over lifetime of quarry	500,000	As per 3.1 of revised Transport statement
Lifetime of quarry in years	5	As per 3.2 of revised Transport statement
Tonnage per year	100,000	As per 3.3 of revised Transport statement
HGV load in tonnage	20	As per 3.4 of revised Transport statement
Number of vehicle movements in pa	5,000	Assume empty
Number of vehicle movements out pa	5,000	
Total vehicle movements pa	10,000	
Number of working days pa	245	
Number of vehicle movements per day	41	

Waste infill

Assume similar amount of waste infill	500,000	As per 3.7 of revised Transport statement
Lifetime of quarry in years	6	As per 3.7 of revised Transport statement
Tonnage per year	83,333	
HGV load in tonnage	20	Assume same tonnage as for sand and gravel
Number of vehicle movements in	4,167	As per 3.9 where developers acknowledge that it is unlikely that the same vehicles would be used to bring in infill then go out with sand and gravel
Number of vehicle movements out	4,167	
Total vehicle movements	8,333	
Number of working days pa	245	
Number of vehicle movements per day	34	

In summary, based on the developers' own figures, there will be the following number of HGV vehicle movements per day:

Sand and gravel vehicle movements per day	41
Waste infill vehicle movements per day	34

Total vehicle movements per day

75

Inaccuracies

3.5 states 20 HGV movements per day for sand and gravel extraction

3.7 states 17 HGV movements per day for waste infill

It would appear that the 34 total vehicle movements stated by the developers are for one direction only and should be double the figures they have stated at 3.5 and 3.7.

3.13 where the developers have shown the volume of traffic that they believe the HGVs will generate during hourly slots throughout their working day. This totals 50 HGV movements a day which contradicts the 37 total that the developers have stated at 3.5 and 3.7.

Developers' timings

Time	Site Arrivals	Site Departures	Total movements	Comments	% of total
07:00 – 08:00	3	3	6		11.11
08:00 – 09:00	0	0	0		0.00
10:00-11:00	5	5	10		18.52
11:00-12:00	5	5	10		18.52
12:00-13:00	5	5	10		18.52
13:00-14:00	5	5	10		18.52
14:00-15:00	0	0	0		0.00
15:00-16:00	4	0	4	What has happened to the 4 shown as arriving?	14.81
17:00-18:00	0	0	0		0.00
Totals	27	23	50	This contradicts the revised Transport statement which says there will be 37 vehicle movements a day	

Using the 75 vehicle movements we calculated earlier, using the percentage split for the times the developers have stated at 3.13 gives what we calculate to be a more accurate distribution of vehicle movements as follows:

Revised timings based on 75 vehicle movements a day

Time	Site Arrivals	Site Departures	Total movements	
07:00 – 08:00	4.16	4.16	8.31	We are disputing that this time period should not be included due to school buses starting at 7.15
08:00 – 09:00	0.00	0.00	0.00	
10:00-11:00	6.93	6.93	13.86	
11:00-12:00	6.93	6.93	13.86	
12:00-13:00	6.93	6.93	13.86	
13:00-14:00	6.93	6.93	13.86	
14:00-15:00	0.00	0.00	0.00	
15:00-16:00	5.54	5.54	11.09	Assume that same number of vehicles will be departing
17:00-18:00	0	0	0	
Totals	37.41	37.41	74.83	

Increase in heavy vehicle movements

3.23 states that “the total HGV percentage would still be well under 10% which is a common percentage of HGVs on Classified roads such as the A588.” (N.B The developers make no mention of the B5270 at this point)

Using the average data from the traffic survey undertaken between 6-12th October 2023 on the B5270¹ to calculate the average traffic movements between 07:00 and 17:00 gives the following:

Existing	Westbound	Eastbound	Total
Total traffic	1206	1184	2390

¹ Columns E – M on Eastbound and Westbound Class tabs used

Heavy vehicles	107	120	227
% of existing heavy vehicles	8.85	10.16	9.50

If an additional 37.5 movements in each direction are added, then the results are as follows:

Revised	Westbound	Eastbound	Total
Total traffic	1244	1221	2465
Heavy vehicles	144	158	302
% of heavy vehicles	11.59	12.92	12.25

The revised percentage **thus goes above the 10% threshold** stated by the developers at 3.23.

The traffic survey undertaken between 6-12th October 2023 on the B5270 calculated average heavy vehicles as follows:

Time	Eastbound	Westbound	Totals
07:00	11	6	17
08:00	11	16	27
09:00	9	13	22
10:00	7	9	16
11:00	10	10	21
12:00	10	7	17
13:00	11	12	22
14:00	12	13	25
15:00	10	11	21
16:00	9	12	21
17:00	7	11	18
Totals	107	120	227

Timings are included for the hours that the developers state the HGVs will be arriving and departing

An additional 75 HGV movements a day would equate to a **33%** increase in heavy vehicles on the B5270 during the times of operation of the proposed quarry.

4. Access Arrangements and Local Highway Improvements

- 4.1. The site operator cannot police HGV movements that may come from the Knott End direction to access the quarry. On finding they cannot access the site from this direction they would have to continue to Pointer Corner and then do a U turn on the junction which would create a further safety hazard, particularly if the island is removed.

4.2 and 4.3

The required **visibility splays** to achieve good visibility as quoted by the developer, **cannot be achieved** particularly without the proposed cutting of hedges and encroachment onto land outside of the developers' ownership.

It is important to note that the required visibility splay distance of 43 metres is subject to increase for higher speed limits. In the highway authority's response to Lancashire County Council on the application, they referenced a mean speed of 37 mph and recommended larger splays accordingly. Additionally, it should be highlighted that this road was historically a 60-mph zone, and many drivers continue to exceed the current speed limit, further emphasising the need for extended visibility splays to ensure adequate highway safety.

- 4.4. Refers to 'an overgrown bush to be cut back' at the access road to site. The hedge is in the ownership of Xanthe Barker Wilde and as such, as highlighted earlier, any intention to alter, cut back, or widen this or any other hedges or verges belonging to her or the other property owners on Lancaster Road, would constitute an unauthorised encroachment and trespass under property law. Therefore, the developers do not have the legal right to maintain these hedges in a manner that would achieve the minimum visibility splay **required to meet legal highway safety standards**
- 4.5 Refers to relocating the mirror assisting drivers exiting Turbo Rebuild to the access road boundary fence. However, this is not under the developers' control, as there will be no fence directly in front of their entrance as they need vehicle access. Additionally, the boundary fence to the west of the access road is

owned by Xanthe Barker Wilde, not the developers, so it is not in their control to re-site in a suitable place, increasing the safety risk of vehicles exiting Turbo Rebuild.

- 4.6 It is claimed that signage will discourage vehicles from speeding along with the recently introduced 30 mph speed limit. The 30 mph has been in force for some time and motorists continue to exceed the speed limit on Lancaster Road. Any additional signage or flashing lights are unlikely to change this behaviour, as they are often ignored. The photo below is of an accident on the Pointer House corner on **15th September 2023** and demonstrates that, despite the 30-mph speed limit, this accident still occurred.

Accident 15 Sept 2023 – Pointer Corner Lancaster Road B5270



- 4.7 The table referenced is incorrect in the first instance as the headings provided are the A588 whereas the information below the headings is actually referencing the B5270 when checked in Appendix A. Furthermore, there appear to be far too few buses shown – both school buses and PSV buses:

Time	Type (with approx. times passing quarry)	No.
07:00 – 08:00	No. 89 PSV from Lancaster (07:08)	1
	No. 89 PSV from Knott End (07:25)	1

Time	Type (with approx. times passing quarry)	No.
	No. 88 PSV from Knott End (07:45)	1
07:15 – 08:15	School buses	7
08:00 – 09:00		0
09:00 – 10:00	No. 88 PSV from Lancaster (09:08)	1
	No. 89 PSV from Knott End (09:25)	1
	No. 89 PSV from Lancaster (09:43)	1
10:00 – 11:00	No. 88 From Knott End (10:00)	1
11:00-12:00	No. 88 from Lancaster (11:13)	1
	No. 89 From Knott End (11:30)	1
	No. 89 PSV from Lancaster (11:53)	1
12:00-13:00	No. 88 PSV from Knott End (12:10)	1
13:00-14:00	No. 88 from Lancaster (13:23)	1
	No. 89 from Knott End (13:40)	1
14:00-15:00	No. 89 PSV from Lancaster (14:13)	1
	No. 88 PSV from Knott End (14:30)	1
14:15 – 14:45	School buses	8
15:00-16:00	No. 88 from Lancaster (15:53)	1

Time	Type (with approx. times passing quarry)	No.
16:00-17:00	No. 89 PSV from Lancaster (16:23)	1
	No. 89 PSV from Knott End (16:25)	1
	No. 88 PSV from Knott End (16:55)	1
Total buses		34

4.9 The B5270 is currently 5.5 metres at its widest point. The proposed 300mm road widening on each side would encroach on Lancaster Road residents' land, constituting unauthorised encroachment and trespass under property law. The hedges and verges along the road are already maintained by the property owners (from as far back as 1946), as shown in numerous photos and drawings, and are trimmed as much as possible while preserving their stability. Immediately at the side of some of these hedges are dykes, widening would create a risk of vehicles going into the dykes further limiting the suggested potential widening

HAUCuk (Highways Authorities and Utilities Committee) advice from a safety perspective that cars and light vehicles should have a minimum of 5.5 metres with normal traffic including buses and HGVs having a minimum 6.75 metres

The HSE states that all two-way access roads must have a width of 7.3 metres, allowing for twice the width of a lorry. Neither Lancaster Road nor the access road itself can accommodate this recommendation.

- Furthermore, this widening would severely impact the safety of vulnerable road users with pedestrians now not having even a 'step' away

area in some places onto a narrow verge.

4.10 300mm of widening of the carriageway is based on trespass onto private land.



Notwithstanding the trespass issue, the road widening suggested is not achievable along the full length of the road and in particular in the most dangerous spot which is Pointer Corner.



Neither is 300mm achievable at a number of points where there is so little verge and the hedge is so sparse that the dykes are close to the road edge. Reducing the area as suggested would put vehicles at a severe risk of falling into the dyke.

The importance of these dykes cannot be underestimated in a flood zone area and where surface water is already an issue.



View from the dyke side of Hillfield towards the new entrance – sparse hedge between the dyke and the road



View from Lancaster Road Side Facing towards Hillfield - sparse hedge & minimal verge



View towards the new entrance From Hillfield House side

In a number of places HGV wing mirrors will actually be over the hedge or centre line. In particular turning into the access road an HGV will be touching the fence line at Pointer Stables. In addition, once entering the access road the HGV will touch the boundary hedge on the left-hand side. Also, the dyke on the west side of the entrance is at risk due to in-turning vehicles overhanging the boundary of Xanthe Barker Wild’s land.

Clearly shows wing mirror overhang – bus has over run the verge into the hedge. Two HGVs passing would be wider than the bus



- 4.10 References to the site traffic being managed are unrealistic, as the site cannot control all traffic on Lancaster Road, nor can it control all traffic on the A588 — only the traffic directly associated with the site, and even that is questionable. How will village traffic, farm vehicles etc. and all the other traffic on the A588 at points such as Fold House corner and Burned House corner be managed?

Additionally, management would only occur during opening hours, leaving issues such as HGVs arriving early, which is common for these types of sites, unaddressed.

- 4.11. It is suggested that road edging would reduce the speed of light vehicles, but it is unclear how this would be achieved as highlighted in the points above. Additionally, if rumble strips were installed as proposed, they would likely cause noise disturbances within nearby properties, as demonstrated when similar strips were painted on Burned House Corner years ago and later removed due to complaints. It also references the additional width being available for occasional HGV use; 75 movements a day is not occasional.
- 4.12 As mentioned in previous points, road widening cannot be achieved as the land required to achieve this does not belong to the developer. Furthermore, the two way management system does not stand up to scrutiny – furthermore, 75 movements a day (which if restricted to fully avoid school hours is 18 movements an hour, or partially avoiding school hours is 12-13 movements an hour), does not make it an **unlikely event** that two HGVs will encounter each other entering or exiting the site.
- 4.13 This is incorrect. As previously noted, widening the road involves trespass and is not feasible along the entire route. The statement here that the carriageway will not extend to the property boundary is unclear —why is this highlighted? Is this because the **concreted area in front of Vine House garden wall**, up to the edge of Lancaster Road actually belongs to Xanthe Barker Wilde, so again to assert use of this would mean trespass on private land?

Furthermore, there was no formal agreement on the ‘priority proposal’, indeed it was deemed entirely unsuitable before this updated statement was submitted

- 4.14 The developers **acknowledge** that **HGVs will need to cross the centre line near a blind bend** at Vine House, but their proposed mitigation measures are inadequate. Warning signage on Lancaster Road will not provide sufficient advance notice, as drivers will see it too late to react. Furthermore, the proposed placement of signs is impractical, as the existing posts suggested are on residents' property boundaries, and residents will not allow signs to encroach on their land. This leaves the option to place signs encroaching into the road which would reduce road width and create additional hazards.

The suggested flashing signs, activated hundreds of times daily, would significantly impact residents, particularly those with windows less than 5 metres from the road, including Vine House, Pointer House, Pointer Cottage and Hillfield House. Additionally, the developers’ drawings (e.g., 220503/3)

inaccurately depict these properties and their proximity to the road, creating the misleading impression of larger boundary areas. The photo below clearly show that a number of properties on Lancaster Road would be classed as sensitive receptors.

Sensitive Receptors - Properties on the road edge of Lancaster Road and round Pointer Corner



Finally, the risks to pedestrians and other vulnerable road users, such as pedestrians, cyclists and horse riders, would increase due to these measures of queuing vehicles, sudden braking, and overall reduced safety. The Highway Code, updated on 29th January 2022, introduced the **Hierarchy of Road Users** under Rule H1. This rule places the greatest responsibility on those who can cause the greatest harm—such as HGV drivers, PCV drivers, van drivers, and car drivers—to reduce danger to vulnerable road users, including pedestrians, cyclists, and horse riders.

Lancaster Road, presents a particular concern in this context. Its narrow width significantly increases the risk posed by the proposed development's reliance on heavy goods vehicle (HGV) movements. The limited road space exacerbates the potential for collisions and near misses with vulnerable road users, directly contradicting the Highway Code's objective to prioritise their safety and foster a more considerate road-use culture.

- 4.15 There is no point 4.15 - has something been omitted? It doesn't appear in the developers' submission
- 4.16 The road from the A588 to the entrance of Lancaster Road is shown as being widened, but this entry has never been a problem. The real issues lie along Lancaster Road itself, which cannot be fully widened as proposed. Moreover, widening the entrance could encourage speeding, as vehicles would no longer need to slow down to give way at the junction.

5. Other Matters

i. Sensitive Locations Assessment

The Transport Statement rightly provides the IEMA classification of population groups that may be 'sensitive' to changes in traffic conditions. Of the 14 listed in 5.2 and 5.3 at least 10 populations are impacted by this development.

- 5.4 Traffic flow on the B5270 Lancaster Road passes the material threshold by increasing heavy vehicle traffic by **33%** during the hours of operation of the proposed quarry; thus rule 1 of the IEMA 1993 guidelines should be applied.
- 5.5 The analysis shown here relies on averaged traffic data (AADT), which understates the true impact on local roads, particularly during peak times or periods in sensitive areas. It selectively uses thresholds which downplay potential disruption while failing to address critical issues like peak-hour impacts, HGV scheduling reliability, and cumulative effects. This approach appears to downplay the full extent of the development's impact and does not sufficiently address the risks to local residents and other road users.
- 5.6 In this statement the developers are suggesting that the additional criteria in the 2023 guidelines for air quality, noise, road safety, and driver delays have been appropriately considered. However, we do not believe this is the case in light of the full impact of anticipated **75 additional HGV movements per day**, particularly along the B5270 Lancaster Road.
- 5.7 The developers' claim that the air quality impact will be negligible is again undermined by the projected 75 additional HGV movements per day. This volume of heavy traffic will significantly increase emissions, particularly NO_x and PM, impacting sensitive receptors along Lancaster Road. The analysis fails to consider localised pollution spikes, proximity to our residential properties and does not address the cumulative effect of these emissions, particularly near sensitive receptors such as Vine House, Hillfield House, Pointer House and Pointer Cottage, where proximity to the road **as shown above**, increases exposure risks.

We are aware that the council have been taking air quality measurements from Pointer House on Lancaster Road for several months now and request that the data is made available to the Lancaster Road Quarry Boundary Residents Association to ascertain the existing air quality and whether it qualifies as an Air Quality Management Area. If so, the development leading to an increase in 75 HGV movements per day would have further relevance.

- 5.8 The percentages quoted for heavy vehicles on the A588 appear to be inaccurate. For ease, we include the table from section 3 showing the increase in heavy vehicles during the opening times of the proposed quarry.

Revised	Westbound	Eastbound	Total
Total traffic	1244	1221	2465
Heavy vehicles	144	158	302
% of heavy vehicles	11.59	12.92	12.25

The developer argues that the traffic increase falls below thresholds for noise (1 dB), which assumes ideal conditions and AADT averages that dilute peak-time impacts. Additional HGV movements, particularly during peak hours, will increase noise levels, affecting residents along the route. Sensitive receptors, such as all residents on Lancaster Road and in particular, Vine House, Pointer House, Pointer Cottage and Hillfield House, are likely to experience heightened noise exposure due to their proximity to the road. The developers' assessment fails to acknowledge the amplified noise from heavy vehicles navigating this narrow road, especially in proximity to these sensitive properties.

- 5.9 The developers assert that the proposed development will add 44 vehicles (HGVs and others) to the 4,384 vehicles using the A588 between 07:00 and 18:00 on weekdays, resulting in only a 1% increase. We do not know how the developers have calculated a figure of 44 additional vehicles or indeed whether this is vehicles or movements. As clearly demonstrated from our calculations the total number will be 75 HGV movements (see section 3). Most importantly, the developer **fails to address the main impacted area** i.e. the B5270 Lancaster Road.
- 5.10 The developers do not account for peak-hour traffic surges, when the impact of additional HGV movements is most pronounced. Lancaster Road is already constrained, with limited passing places and narrow sections. The additional HGVs will likely create delays, particularly at specific potential bottlenecks or blind bends or where the developers are suggesting HGVs should wait so they do not pass each other.

Increased delays pose further risks for pedestrians, cyclists, and horse riders, who may face additional hazards from queuing vehicles or HGVs navigating tight

spaces. The statement does not outline any proactive measures to manage or reduce potential delays caused by the additional HGV traffic.

- 5.11 Driver delay **is** relevant in this case as the proposed development is very likely to result in congestion due to traffic being controlled but not considering other road users, i.e. farm vehicles, village traffic and public transport which fluctuate throughout the year and in particular tractors at harvest time. Pedestrians, cyclists, and horse riders will face reduced safety from idling and manoeuvring HGVs on narrow roads, undermining claims of negligible impact.
- 5.12 We do not know where the figure of an average 3 HGVs to any existing flow comes from, 75 additional HGV movements divided by the 6 hours per day that vehicle movements will be allowed i.e. less the 2 hours per day for school buses (which currently does not include the Stalmine School interruptions) that are not included in the timing schedule – see section 3, gives an increase of **12 HGV movements per hour or four times** the amount stated by the developer. This approach also masks localised traffic surges, cumulative effects, and the significant burden of multiple HGVs operating in a constrained environment on Lancaster Road during peak times. This also fails to account for the road's narrow sections, blind bends, and the additional risks posed to vulnerable road users, all of which amplify the impact of concentrated HGV traffic.
- 5.13 The developers assert that the development will add 26 two-way HGV trips per day, split evenly on each side of Lancaster Road. They state that this results in a total of 138 existing HGVs plus 26 additional HGVs, remaining well below the 200 HGV threshold. However, as we have ascertained throughout this statement there are actually 75 trips per day which **takes us above the 200 HGV** threshold and the 1993 and 2023 IEMA guidelines, as well as the DMRB criteria for further air quality and environmental assessment. Furthermore, we will point out in 5.14 that the threshold calculations applied **are applicable to the A588 only** and **have not been applied to the B5270 Lancaster Road** which all of the 75 trips will also traverse.
- 5.14 Again there are inaccuracies in the number of HGVs that the development would add – see again calculations in section 3 where the increase would be 75 HGV movements per day. Besides once again quoting different figures, these figures relate to **the A588** and do not actually **address the B5270 impact**.
- 5.15 We contest the developers' assertion that 'traffic increases do not warrant further assessment' and we recommend the following:

- conducting a comprehensive traffic assessment following IEMA 2023 guidelines, focusing on the B5270 as well as the A588
- disclosing council air quality monitoring data to evaluate potential AQMA status and undertaking noise impact assessments per IEMA and DMRB standards
- addressing highway safety concerns through a DMRB-compliant safety audit to account for accident clusters and the disproportionate HGV traffic increase on the B5270; and holding the developers accountable for inconsistencies in their calculations, highlighting the need for a more robust environmental and transport impact analysis.

5.16 As identified in 5.13 the increase is above the threshold and therefore any traffic **will be noticeable** within the existing flows to Lancaster.

In points 5.17 to 5.19 the sensitive locations have been downplayed and as mentioned above are mainly related to the A588

5.17 In terms of the A588, the current evidence of vehicle damage to boundary walls at Fold House Farm demonstrates existing challenges in accommodating HGV traffic. Given the existing vehicle damage, there is a clear indication that the area is sensitive and requires stronger interventions than signage.

Indeed, since the wall was demolished at Fold House corner and repaired in 2024, the post that has been added on the corner to protect the wall, already has considerable paint from vehicles on it, as has the warning sign on the opposite side of the road



Fold House Corner A588 pre repair



Fold House Corner A588 post repair
Damage to newly added post



Fold House corner opposite the
Post – damaged warning sign

Adding more HGVs, even with proposed signage, will exacerbate this problem. The claim that additional signage will "improve the situation for all users" lacks

substantiated evidence or precedent. Signage alone may not mitigate risks posed by increased HGV movements, especially on bends already proven problematic for large vehicles.

The diagrams referenced by the developers show several bends along the route. The photos used are misleading as the photos taken have used a wide-angle lens and the use of a tiny white Datcha Sandero Sidestep with a width of **1850mm wide as opposed to an HGV which is 3m wing mirror to wing mirror** in all of the Appendix B photos. In addition, in these photos the Datcha sits extremely close to the hedge at Fold House Corner giving the illusion of greater room. This vehicle is not representative of the additional HGVs and the consequent impact that needs to be addressed

- 5.18 The developers state that “In the case of the route to the south (Diagrams 5 to 12, Pages 3 to 6), the only sensitive location would be outside the St. Almine (sic – should read Stalmine) Primary School on the Mill Lane section of the A588 to the north of the Moss Side Lane junction.” The developers fail to mention the sharpness and limited visibility on bends such as Lancaster Farm on Burned House Lane, Burned House /Cemetery Lane corner (below) to name just a couple, where there is an increased risk of collisions, particularly when multiple HGVs are on the route simultaneously.

Burned House /Park Lane Corner



- These areas may already see occasional HGV usage, but the increase in frequency proposed by the development will cause a cumulative risk, further deteriorating safety.
- The diagrams highlight narrow road sections and **minimal verge width along the entire route**. This creates limited passing space for two large vehicles (HGVs or buses) or even an HGV and a car, heightening the likelihood of traffic disruption or accidents.
- These narrow sections are not addressed with widening or structural improvements in the proposal, making them a potential bottleneck.
- Contrary to the developers' comments, some residential properties along the route are close to the road, as shown in the diagrams. Increased HGV movements will lead to:
 - Greater noise pollution and vibration affecting the structural integrity of older buildings.
 - Potential road safety risks for residents, especially pedestrians, as the road lacks adequate pedestrian infrastructure like footpaths.
- The diagrams mention that bends and other sections already accommodate HGVs "without verge overrun." This is inaccurate as can be seen in winter when there are many occasions of verge overrun all along the A588 and consistently on the B5270. The added traffic is likely to add to frequent verge overruns, damaging the road edges and adjacent property boundaries, as well as creating safety hazards for other road users.

Verge damage



5.19 School timings are incorrect as highlighted previously.

ii. Highway Safety

The Highway Safety section provides an inadequate assessment of risks associated with the proposed development. We address these issues below but also in our response to the developers' Conclusion section.

- The analysis is limited to recorded accident clusters, failing to assess the broader safety implications of introducing significantly more HGVs to a road network that is already constrained in key areas. It also overlooks potential risks associated with increased vehicle size and frequency on a road network not designed for such loads.
- By limiting the safety assessment to recorded accident clusters, it also misses those that have not been recorded.
- The report does not account for how the additional HGV movements could impact vulnerable road user safety, particularly on narrow sections and at bends where conflicts are more likely to occur.
- Vehicle damage at Fold House Farm is acknowledged, but the report does not classify it as a significant safety concern. The absence of recorded

accidents is not sufficient to dismiss the dangers posed by narrow bends combined with higher HGV volumes

- The dismissal of the 2019 accident at Burned House Lane as irrelevant ignores the possibility of underlying design flaws at the junction, where more accidents than those recorded have occurred and which now could be exacerbated by increased HGV traffic

5. Developers' Conclusions

The numbering of this section does not follow that of the previous paragraphs so **there are two 5.1s in their submission**. The following responses are made towards the items contained in the developers' conclusion section

- 5.1 The developers' claim that "The proposed development will not result in a high level of HGV traffic generation compared to other mineral extraction sites" is irrelevant. Unlike most other sites, this proposal is situated in an unsuitable location, with all HGV traffic entering and exiting via a narrow B road. Moreover, the A588, which would bear the brunt of this increased traffic, is widely acknowledged as one of the most dangerous roads in the country.

The claim that HGV traffic levels are low are based on inaccurate figures and also fails to consider the cumulative impact on narrow roads, sharp bends, and nearby residential areas, where even minor increases in traffic can significantly affect safety, infrastructure, and quality of life.

- 5.2 Makes no mention of the cluster of properties on Pointer Corner where all the HGV traffic will pass.
- 5.3 The assertion that traffic increases are "well below the level expected" is false in terms of the B5270 in particular and also underestimated on the A588. As stated elsewhere, the increased traffic will result in a 32% increase in heavy traffic on the B5270 and more than 12% on the A588. It also ignores localised impacts at key junctions, bends, and pinch points, which will experience significant safety and congestion issues due to the additional HGV movements.
- 5.4 While the commitment to avoid school traffic times is acknowledged, the developers' proposed non-operating hours do not align with the actual school and bus schedules. On Lancaster Road, seven St Aidan's school buses operate between 07:15 and 08:15, and eight between 14:15 and 14:45, times that are not fully covered by the developers' plan. Similarly, Stalmine School operates between 08:00 and 09:00 and closes at 15:20, further highlighting the

discrepancy. Therefore, the window that the site would not operate on would need to be much wider. Additionally, the proposal fails to address risks to pedestrian safety and the noise and vibration impacts on residents during other operating hours.

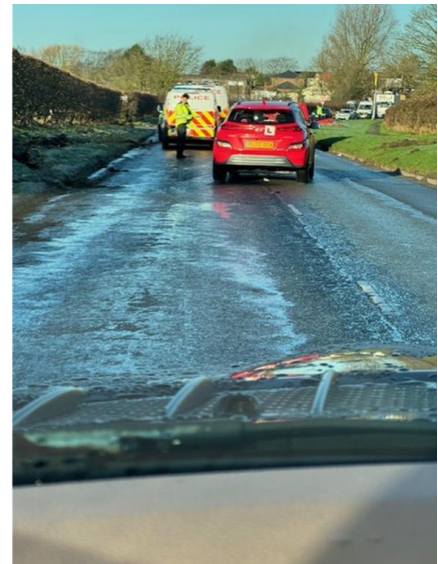
- 5.5 This is wholly inaccurate. There will be between **8-13** vehicle movements per hour of operation, **not 3** so even if there is an even split at the Head Dyke Lane junction this equates to either 4 or 6.5 vehicle movements an hour. No mention has been made of the increased vehicle movements on the B5270 which will be traversed by all quarry HGVs. The focus on "average" HGV movements also obscures the reality of peak traffic conditions, which would lead to higher congestion and risks at critical points along the route.
- 5.6 Properties along the stretch of the B5270 where the road widening is proposed are disputing the legality of this encroachment onto their properties. The proposed highway works, such as road widening and signage are also unachievable **in the majority of places**. Even these are insufficient to address the structural and safety challenges posed by increased HGV traffic, particularly on narrow sections and bends and actually increase the risk to safety.
- 5.7 The conclusion that the area has a "very good" accident record is a **spurious assertion**, given it is considered to be one of the most dangerous roads in the country. Also, to state that there is good visibility on the A588 when there are 3 blind bends along it is inaccurate. As in our original objection we would draw attention to the following, plus some more recent accident information:
- A Blackpool Gazette article from 30th November 2016 highlighted that the A588 has a long history of fatal accidents, claiming a dozen lives in the last 20 years. Between 2011 and 2013, there were 45 fatal crashes and 569 serious crashes on the A588, making this the most dangerous road in Britain, according to Drive Johnsons.
 - Between 2017 and the end of 2023, there has been an average of 17.86 recorded (Lancashire County Council Collision and Casualty Statistics) accidents a year on the A588 between Shard Bridge and Cockerham (excluding Covid lockdown years, a number of these being fatal and/or serious). Whilst this number is high, it still does not accurately reflect the actual number of accidents that police are called out to or that are witnessed by local residents without police involvement that are not recorded.
 - Residents have also witnessed several accidents on Pointer corner which are not shown on the official list over the same period. Indeed, as

mentioned previously, there was a collision at Lancaster Farm on Burned House Lane which necessitated closure of the road and traffic being diverted round Park Lane, down Cart Gate and then onto Lancaster Road to then join the A588 again. This would be totally unfeasible and have an extremely dangerous impact should quarry lorries be diverted in the same manner.

- In addition, as recently as 7th October 2024, 1st January 2025 and 2nd January 2025 there have been further accidents on the A588 all attended by the police;
 - on 7th October along the A588 Carr Lane FY6 9DW stretch which necessitated road closures for an extensive period and traffic diverted around very unsuitable single-track country lanes.
 - On 1st January on the A588 Head Dyke Lane a car careered off the road and again the road had to be closed.
 - 2nd January there was a crash involving 4 cars at Hatfields on the A588, 100 yards from the Burned House/Park Lane corner.
 - All of these occurred despite the introduction of traffic calming speed cameras.



Hatfields on the A588 close to Burned House corner



5.8 We would contend that there are significant highways reasons to reject this development as we believe we have demonstrated, given the inadequacy of the safety assessment, the lack of robust mitigation measures, and the significant risks posed by increased HGV traffic to road users and residents. These challenges highlight the flawed assumptions and incomplete analysis in the

developers' conclusions section, undermining its validity and supporting a strong objection to the development.

Appendices and Drawings

We would request consideration of the following observations related to the appendices and drawings.

The **initial** 'cut line drawing' includes the assertion that there are "no major frontage developments or sensitive locations." This statement is misleading, as it fails to provide close-up photographs of key residential Lancaster Road properties such as Hillfield House, Vine House, Pointer House, and Pointer Cottage, as we have shown previously and below.



Proximity of Hillfield House main living Area to the gate to the road



Proximity of Hillfield House gate to the road



Proximity of Pointer House to the road

These residences are all situated in very close proximity to the road edge of Lancaster Road, the route proposed for an additional 75 HGV movements daily.

Excluding these properties from consideration is concerning, given their location along a critical section of the road that will bear the brunt of all HGV movements. The omission downplays the significant impact this development will have on residents in these areas and undermines the accuracy of the assessment. These properties should be acknowledged as part of the evaluation, as they are undeniably part of a key and sensitive location.

The cut line photos provided also appear to have been staged, with the same small vehicle, which appears to be a white Dacia Sandero Stepway, approximately 1850mm wide — featured consistently across the images. This

vehicle is significantly narrower than an HGV, which measures approximately 3 metres from wing mirror to wing mirror, making it over a metre wider.

It appears that the car has been positioned in various photographs to create the illusion of sufficient road space. In one particular image at Fold House Corner, the car is placed unnaturally close to the hedge, further exaggerating the perceived available width. Additionally, a wide-angle lens appears to have been used, which distorts perspectives and makes the road seem wider than it actually is.

These techniques collectively misrepresent the actual constraints of the road and fail to accurately reflect the challenges posed by regular HGV traffic. Such misleading visual evidence undermines the reliability of the assessment and warrants closer scrutiny.

Additional Items

We would also highlight the plans on the portal specifically Plan PA24-6 'Proposed Plant Area' - shows that there will be signage and a gate at the entrance to the access road. If an HGV should arrive when the gate is closed then the only option will be to queue on the B5270, causing disruption to other road users and magnifying all the safety risks we have highlighted throughout this objection.

Flood Risk to the Highway

Between December 2023 and December 2024 there have been 9 flood alert warnings issued to homeowners on Lancaster Road.

Indeed as recently as 1st January 2025 the A588 at Stalmine was flooded and a number of vehicles became stranded. The road was out of use and eventually closed for the best part of the day. Traffic was then diverted around the back lanes and also became 'stuck' due to flooding on these 'back roads'. Other routes that would be used by quarry traffic i.e. Garstang Road to access the A6 and Cockerham Road again providing access to the A6 were both unsurpassable - making the whole area somewhat inaccessible.



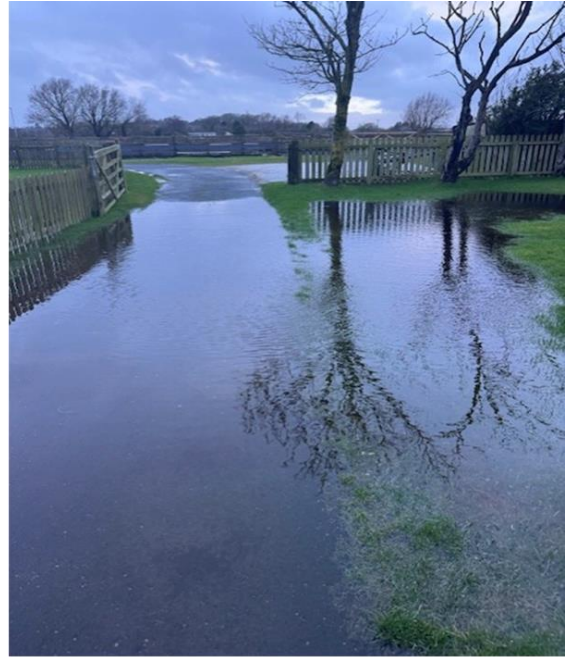
A588 at Stalmine

The proposal to asphalt the full length of the new access road has failed to consider the significant implications for an area already prone to flooding. Specifically in terms of Lancaster Road, existing drains are unable to cope even with light rainfall, as evidenced below and exemplifies this issue. The drainage challenges on Lancaster Road worsened notably after the road surface repairs and we have several photos at different times of the year demonstrating the frequency of this occurrence.

Furthermore, the risk of dykes overflowing and flooding the road, as well as the surrounding land owned by neighbouring landowners, has not been addressed. The entrance to the new access road will **remove the dyke or require a solution for HGVs to cross over a considerable length of the dyke** that currently runs along Lancaster Road. No information has been provided on how this will be addressed. Crucially, in addition, no details have been provided on how the construction of the new access road, which is now planned to be asphalt its full length will affect the drainage system. A relevant precedent is following tarmacking a small section of driveway at Hillfield House, their garden now floods several times a year. Has the impact of introducing such a large non-porous surface been adequately assessed in this context?



Lancaster Road – surface water from
Light rain and over flowing drains



Regular driveway flooding at Hillfield House since
Tarmacing the drive

Human Rights and Development Impacts

We would also suggest that the proposed development and updated transport statement infringe upon our rights under Article 1 of the First Protocol of the Human Rights Act 1998, which protects peaceful enjoyment of possessions. Key concerns include:

- **Encroachment on Private Land:** Discrepancies in road width suggest possible erosion or encroachment onto our properties.
- **Noise Pollution:** Increased traffic of this nature will disrupt the peaceful enjoyment of our homes.
- **Safety Risks:** Unachievable visibility splays, widened roads and altered traffic patterns pose safety hazards for residents and impede safe access to our properties.
- **Environmental Harm:** Cumulative impacts of noise, pollution etc. affect our ability to enjoy our properties peacefully.

These impacts are disproportionate and unjustified, and we request they be fully addressed in the planning process.

Our Conclusions

The revised Transport Statement of December 2024 fails to address critical concerns related to the safety, practicality, and environmental impacts of the

proposed development. Despite minor amendments, the fundamental issues highlighted in our original objection remain unresolved and, in many cases, are exacerbated by the proposed measures.

The developers' analysis contains numerous inaccuracies and misrepresentations, particularly in the areas of vehicle movements, traffic counts, sensitive location assessments, and proposed mitigation measures. These failings have led to an inadequate understanding of the true impact of this development on the B5270 Lancaster Road and the surrounding community.

As outlined above the key objections include:

- **Inadequate and Misleading Assessments:** The sensitive location assessment and traffic data analysis are flawed, relying on misleading photographs, selective and inaccurate data presentation, and thresholds that downplay the scale of the impact. This misrepresentation undermines the reliability of the statement and skews the conclusions drawn.
- **Highway Safety Risks:** The proposed road widening and traffic management measures are unachievable, impractical, unlawful, and insufficient to address the severe safety risks to vulnerable road users such as pedestrians, cyclists, and horse riders. The increased HGV traffic, particularly on the B5270, will significantly heighten these risks.
- **Cumulative Environmental and Social Impact:** The development's impact on noise, air quality, and local infrastructure has been grossly underestimated, particularly for residents living in close proximity to Lancaster Road. The failure to consider the cumulative wear and tear on already fragile road surfaces further highlights the inadequacy of the proposed mitigation measures.
- **Unenforceable and Ineffective Proposals:** Suggested mitigation measures such as signage, traffic flow control, and unlawful road widening lack enforceability, feasibility, and effectiveness, raising doubts about the developers' ability to implement these solutions responsibly.

Given the development's potential to cause a severe cumulative impact on the road network, highway safety, and local amenity, it is evident that the revised Transport Statement does not meet the standards required to justify approval. The proposal remains contrary to the Joint Lancashire Minerals and Waste Local Plan, National Planning policies including the December 2024 up-dated NPPF,

which emphasise the need for balanced development and the Human Rights Act, which protects peaceful enjoyment of possessions.