

Land at Longsight Rd, Langho – Transport PoE

Project name Land at Longsight Rd	Project number 60785314	Client Ribble Valley Borough Council	Author Chris Carter Regional Director
Revision No. 2	Revision date 31 st March 2026		

1. Introduction

- 1.1 AECOM is appointed by Ribble Valley Borough Council (RVBC), the Local Planning Authority, to provide transport planning consultancy services in relation to the appeal concerning the Land off Longsight Road, Langho (“the appeal site”). I, Chris Carter BA (Hons) Oxon, MCIHT, am instructed to act as Expert Witness in relation to transport matters. This document forms my Proof of Evidence.
- 1.2 I am employed by AECOM Ltd as a Regional Director. I am responsible for the Development Transport Planning and Management Team in the Central, South West of England and Wales region. My team provides advice to a range of public and private sector Clients across multiple end markets. This includes providing support to Local Authorities in Highways Development Management and Plan-making, as well as site promotion for public, private and third sector Clients.
- 1.3 I have worked in the field of transport planning for 20 years. I have acted as Expert Witness at a range of Inquiries and Local Plan and DCO Examination Hearings. I have been a Member of the Chartered Institute of Highways and Transportation (MCIHT) for c.17 years.
- 1.4 I am a regular Design Review Panellist for Design West. I hold a First Class Bachelor of Arts Honours degree in Geography from the University of Oxford. I am the Office Leader for the AECOM Ltd Bristol Office, comprising c.350 staff.
- 1.5 I have visited the Appeal Site to experience conditions on site and in the surrounding area. I have reviewed the suite of technical reports and evidence submitted alongside the planning application and to the Inquiry. This includes the Transport Assessment and Travel Plan prepared by Hydrock Fore, and the Statement of Case and its Appendices prepared by Tetra Tech. I have reviewed the Officer’s Report to Committee prepared by RVBC as the LPA, and the Highways Statutory Consultation Response prepared by Lancashire County Council (LCC) as the Local Highways Authority (LHA). I note that the LHA did not object to the planning application. Prior to my appointment, I satisfied myself that the highways reason for refusal was valid, and that remains my view. I have also read the Statement of Common Ground (SoCG) between the LHA and the Appellant, which does not change my views.
- 1.6 My Proof of Evidence considers the information submitted with reference to Planning Policy and Industry Guidance, and applies my professional judgement and experience, enabling me to form and express my professional opinion. I confirm that the opinions expressed are my true and professional opinion, irrespective of by whom I am instructed.

2. Scope of Evidence

- 2.1 This appeal follows the refusal by RVBC with regards to the application for planning permission for the Appeal Site. Permission was applied for:

“up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access).”

- 2.2 The Officer’s Report to Planning Committee recommended Refusal for five reasons. This included Refusal Reason 2 (RfR2):

“The proposed development by virtue of the quantum of development, would result in a large-scale development in a rural location resulting in future users being reliant on a private motor vehicle contrary to Key Statement DM12 and Policies DMG1 and DMG3 of the Ribble Valley Core Strategy and the National Planning Policy Framework which supports sustainable patterns of development.”

- 2.3 I note that the LHA did not object to the planning application, subject to S.106 Obligations and Planning Conditions. However, the Officer’s Report to Planning Committee did provide the rationale for RfR2, ensuring that Members were appraised prior to their decision to include it as a Refusal Reason.

- 2.4 My Proof of Evidence relates to RfR2 only. There are other highways and transport matters in relation to the scheme that I do not contest. These are set out in the Highways and Transport Statement of Common Ground (SoCG).

- 2.5 Clearly, this RfR rests on whether the location and characteristics of the development would result in reliance on private car usage, what the relevant Core Strategy and NPPF policies require, and how they should be applied. My Proof of Evidence does as follows:

- Sets out the relevant policies, including interpretation on how they should be applied in this respect.
- Examines the accessibility of the site for all users. This considers the facilities and services that residents will need to access, and the quality and availability of their options for doing so.
- Considers the effectiveness of the mitigation proposed to address shortcomings in the accessibility of the site.
- Draws conclusions on how the proposals for the site and the inherent accessibility challenges link back to policy.

- 2.6 Helpfully, Mr Blair in his Statement of Case includes a matrix of Policy requirements and how he considers that the scheme addresses those Policy requirements. I replicate that format as I think it clearly sets out the differences between our positions, and is a helpful method of presentation to the Inquiry.

3. Planning Policy

Ribble Valley Core Strategy (CD5.1)

- 3.1 I start with the Ribble Valley Core Strategy. Key Statement DMI2: Transport Considerations states:
- “New development should be located to minimise the need to travel. Also it should incorporate good access by foot and cycle and have convenient links to public transport to reduce the need for travel by private car. In general, schemes offering opportunities for more sustainable means of transport and sustainable travel improvements will be supported. Sites for potential future railway stations at Chatburn and Gisburn will be protected from inappropriate development. Major applications should always be accompanied by a comprehensive travel plan.”*
- 3.2 DMI2 is clear, development should be located to minimise the need to travel, and that where that travel is necessary there should be good alternatives to reduce the need for that travel to be by private car. This is the crux of RfR2 and I set out in this Proof how this is not achieved.
- 3.3 DMI2 supports schemes offering opportunities for sustainable transport and sustainable transport improvements. I do not consider that the site offers its users sufficient opportunity for sustainable transport to be supported by DMI2. I recognise that some improvements are being offered, but I do not consider that these are sufficient to outweigh the challenges of the site location. I note that the application is accompanied by a Travel Plan, a standard requirement of planning applications for many years.
- 3.4 DMG1 deals with general considerations of development, with the relevant transport element of the policy below.
- “Access:
- 1) Consider the potential traffic and car parking implications
 - 2) Ensure safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated.
 - 3) Consider the protection and enhancement of Public Rights of Way and Access.”
- 3.5 As set out in the SoCG, safe access for vehicles, and traffic impact are not matters in dispute. There is a footpath (REF: FP0306006a) which passes through the site. This will be retained, albeit with a minor diversion to accommodate drainage features.
- 3.6 DMG3 is a detailed policy in relation to transport and mobility. It starts with the statement *“in making decisions on development proposals the LPA will, in addition to assessing proposals within the context of the development strategy, attach considerable weight to:”* The policy then lists a number of transport criteria.
- 3.7 Mr Blair’s Statement of Case at 3.4.7 states that *“I have however noted a mis-application of policy. Policy DMG3 requires that “considerable weight” should be given to many positive aspects of the proposals. However, it would appear that weight has not been afforded in the case officer’s assessment.”* Such considerable weight could also be applied negatively to the many aspects where the development performs poorly against the policy criteria.
- 3.8 The criteria of DMG3 are set out below, with aspects where this Proof shows that the development performs poorly highlighted in bold, rather than critiqued in this section, for ease of reference:
- 3.9 **THE AVAILABILITY AND ADEQUACY OF PUBLIC TRANSPORT AND ASSOCIATED INFRASTRUCTURE TO SERVE THOSE MOVING TO AND FROM THE DEVELOPMENT -**
1. THE RELATIONSHIP OF THE SITE TO THE PRIMARY ROUTE NETWORK AND THE STRATEGIC ROAD NETWORK.
 - 2. THE PROVISION MADE FOR ACCESS TO THE DEVELOPMENT BY PEDESTRIAN, CYCLISTS AND THOSE WITH REDUCED MOBILITY.**
 3. PROPOSALS WHICH PROMOTE DEVELOPMENT WITHIN EXISTING DEVELOPED AREAS OR EXTENSIONS TO THEM AT LOCATIONS WHICH **ARE HIGHLY ACCESSIBLE BY MEANS OTHER THAN THE PRIVATE CAR.**
 4. PROPOSALS WHICH LOCATE MAJOR GENERATORS OF TRAVEL DEMAND IN EXISTING CENTRES WHICH ARE **HIGHLY ACCESSIBLE BY MEANS OTHER THAN THE PRIVATE CAR.**
 5. PROPOSALS WHICH STRENGTHEN EXISTING TOWN AND VILLAGE CENTRES WHICH **OFFER A RANGE OF EVERYDAY COMMUNITY SHOPPING AND EMPLOYMENT OPPORTUNITIES** BY PROTECTING AND ENHANCING THEIR VITALITY AND VIABILITY.

6. PROPOSALS WHICH LOCATE DEVELOPMENT IN AREAS WHICH **MAINTAIN AND IMPROVE CHOICE FOR PEOPLE TO WALK, CYCLE OR CATCH PUBLIC TRANSPORT RATHER THAN DRIVE BETWEEN HOMES AND FACILITIES WHICH THEY NEED TO VISIT REGULARLY.**

7. PROPOSALS WHICH LIMIT PARKING PROVISION FOR DEVELOPMENTS AND OTHER ON OR OFF STREET PARKING PROVISION TO DISCOURAGE RELIANCE ON THE CAR FOR WORK AND OTHER JOURNEYS WHERE THERE ARE EFFECTIVE ALTERNATIVES.

ALL MAJOR PROPOSALS SHOULD OFFER OPPORTUNITIES FOR INCREASED USE OF, OR THE IMPROVED PROVISION OF, BUS AND RAIL FACILITIES.

ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO PROVIDE ADEQUATE CAR PARKING AND SERVICING SPACE IN LINE WITH CURRENTLY APPROVED STANDARDS.

THE COUNCIL WILL PROTECT LAND CURRENTLY IDENTIFIED ON THE PROPOSALS MAP FROM INAPPROPRIATE DEVELOPMENT THAT MAY BE REQUIRED FOR THE OPENING OF STATIONS AT GISBURN AND CHATBURN. ANY PLANNING APPLICATION RELATING TO THESE SITES WILL BE ASSESSED HAVING REGARD TO THE LIKELIHOOD OF THE SITES BEING REQUIRED AND THE AMOUNT OF HARM THAT WILL BE CAUSED TO THE POSSIBLE IMPLEMENTATION OF SCHEMES.

THE COUNCIL WILL RESIST DEVELOPMENT THAT WILL RESULT IN THE LOSS OF OPPORTUNITIES TO TRANSPORT FREIGHT BY RAIL.

- 3.10 It is clear from the policy that being highly accessible by means other than the private car, as well as choice of modes being available for all, including those with reduced mobility, is key to compliance. This Proof demonstrates that this will not be achieved by the proposed development, and the sustainable transport improvements proposed will not offset locational challenges which result in non-compliance with this policy.

NPPF (CD6-1)

- 3.11 The December 2024 NPPF is the adopted version at the time of writing this Proof. Paragraph 89 has been referenced by Mr Blair in his Statement of Case, albeit noting that Mr Blair also does not consider the site to be in a rural area, rendering the point moot. Paragraph 89 states:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 3.12 Paragraph 89 is often used to argue that rural development, including housing, only has to avoid unacceptable traffic impact and to take up whatever sustainable transport opportunities may exist, even if the development would remain inaccessible by sustainable modes. However, this is a partial reading and an oversimplification as the need for such a development, in this case housing, in such a location must be established for this to apply. I note that the consultation draft December 2025 NPPF retains the thrust of the policy in E4 Rural Business Development, but appears to limit its scope to supporting business in rural areas, rather than housing. I appreciate that the December 2025 Consultation Draft is not adopted, but it is a useful indication of the intention of policy makers.

- 3.13 Paragraph 110 states:

“110 The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

- 3.14 This highlights the importance of locations which are, or can be made sustainable, and developments which offer a genuine choice of transport modes. I contend that neither of these are achieved in this case. I recognise the statement that opportunities will vary between urban and rural areas, but I do not consider that the extent of the shortfall in the first part of the policy is outweighed even taking this into account.

- 3.15 Paragraph 115 sets out:

“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.”

3.16 I do not consider that safe and suitable access to the site can be achieved for all users. This includes vulnerable road users such as children and those with reduced mobility, as well as those without access to a car. This links closely with Paragraph 110, which requires “genuine choice”, which I do not consider would exist for residents.

3.17 In relation to point d), it is common ground that the development will not give rise to significant highways capacity impacts. However, the safety of pedestrian and cyclists is a significant concern.

3.18 Paragraph 117 sets out:

“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.”

3.19 I do not consider that the development addresses the needs of people with disabilities and reduced mobility in relation to all modes of transport. The use of Whitehalgh Lane by pedestrians and cyclists, as well as development traffic, introduces scope for conflicts between pedestrians, cyclists and vehicles. I set out in later sections of this Proof the significant limitations of the walking routes to the train station and facilities in Langho including bus stops, convenience store, pharmacy and primary school.

3.20 In his SoC, Mr Blair references the NPPF Glossary, which defines Sustainable transport modes as “*Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.*”

3.21 Mr Blair uses this to argue that private car usage is not necessarily unsustainable as ULEV, ZEV and car sharing are listed under the definition. I note this point, but also that the requirements of policy are multi-faceted. It should also be noted that Core Strategy policies DMI2 and DMG3 refer to reducing the need to travel by private car, and modes other than private car. Thus there is specific policy basis for a Refusal Reason citing reliance on the private car.

4. Facilities and Services

4.1 As has been demonstrated in the policy section, it is important to understand the ability for people to access the facilities and services they need on a regular basis, by all modes of transport. This enables us to take an informed view on the degree to which proposals comply with Policy, or otherwise.

Trip Purpose

4.2 As a starting point, I have reviewed the National Travel Survey (NTS) (CD6.19) to understand the proportion of trips undertaken by trip purpose. I have considered the traditional AM and PM peak hours, three-hour AM and PM peaks, and the 12-hour 0700-1900 hours period, for the latest available data set. This is set out in Table 4-1.

Table 4-1: National Travel Survey (NTS), Trip Start Time by Trip Purpose, 2023-2024

Trip Purpose	Time Period				
	AM Peak Hour (08:00-09:00)	AM Peak Period (07:00-10:00)	PM Peak Hour (17:00-18:00)	PM Peak Period (16:00-19:00)	12-hours (07:00-19:00)
Commuting	16%	22%	25%	20%	14%
Business	3%	4%	3%	3%	3%
Education	28%	15%	3%	4%	8%
Escort Education	26%	13%	3%	3%	7%
Shopping	4%	10%	13%	15%	19%
Other work, other escort and personal business	13%	17%	19%	19%	19%
Visiting friends, entertainment and sport	4%	8%	22%	24%	17%
Holiday, day trip and other	7%	12%	12%	12%	14%
All Purposes	100%	100%	100%	100%	100%

4.3 Commuting and business trips represents a fifth to a quarter of all trips in the peak periods, dropping to 17% for the day as a whole. Education and Escort Education trips represent a high proportion of trips in the morning, over half of all trips between 0800-0900 hours, reducing to 15% of trips when averaged across the day. Shopping equates to a fifth of trips across the day.

4.4 This analysis also highlights the importance of a range of additional leisure, work and personal business trips, which account for half of all trips across the day.

Employment

4.5 There are limited employment opportunities in the village of Langho itself. The TA does not discuss accessibility to employment alongside other land uses in the section on pedestrian accessibility, and Mr Blair’s SoC only refers to access to employment in terms of bus and rail. I concur that there are limited employment facilities of significance within walking distance, although I note that places such as schools also provide employment. The TA identifies a potential 8km cycling catchment, which includes nearby villages and parts of Blackburn.

4.6 In considering access to employment, I have reviewed the Census Journey to Work datasets including Ribble Valley 07 and 08 Middle Super Output Areas (MSOA), where the Appeal Site is located (shown in Figure 4-1), and the North West as a whole for comparison. I have done this for 2011 (CD6.20) and 2021 (CD6.21), noting that the 2021 survey was heavily affected by the Covid-19 Pandemic. This is set out in Table 4-2.

Figure 4-1: Extent of Ribble Valley 07 & 08 MSOAs

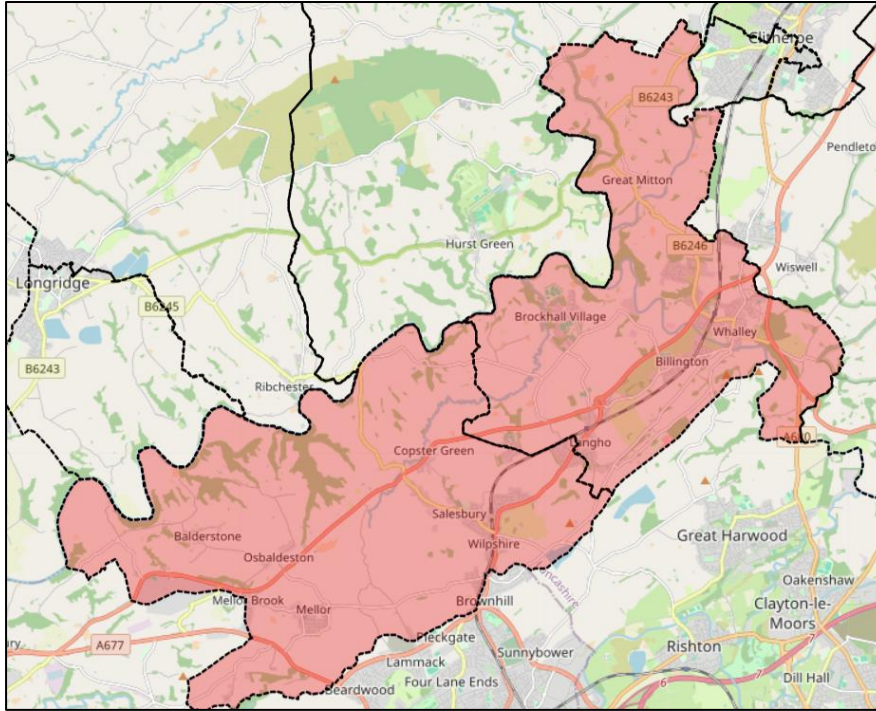


Table 4-2: Census Journey to Work Mode Share

Method of Travel to Work	Census 2011		Census 2021		Census 2021 (Excluding WFH)	
	Ribble Valley 07 & 08	North West Region	Ribble Valley 07 & 08	North West Region	Ribble Valley 07 & 08	North West Region
Work mainly at or from home	0%	0%	34%	27%	N/A	N/A
Underground, metro, light rail, tram	0%	1%	0%	1%	0%	1%
Train	2%	3%	1%	1%	1%	2%
Bus, minibus or coach	2%	9%	1%	4%	1%	6%
Taxi	0%	1%	0%	1%	0%	2%
Motorcycle, scooter or moped	1%	1%	0%	0%	0%	0%
Driving a car or van	84%	65%	57%	50%	86%	68%
Passenger in a car or van	5%	7%	3%	5%	5%	6%
Bicycle	1%	2%	1%	2%	1%	2%
On foot	4%	12%	3%	8%	5%	11%
Other method of travel to work	0%	0%	1%	1%	1%	1%
All Modes	100%	100%	100%	100%	100%	100%

- 4.7 Both datasets show a high level of car reliance for journeys to work. It is pertinent to note that the proximity of the Langho Rail Station is seen as a key sustainable transport “selling point” by the Appellant, yet the rail mode share was only 2% in the 2011 Census. Bus mode share was also low at 2%.
- 4.8 The 2021 survey shows roughly a third of people working from home, but also a high level of car reliance for those trips to work that are made physically. I have shown analysis of the 2021 excluding those who work from home to illustrate this. Limited conclusions can be drawn from the 2021 dataset in isolation in terms of how a development will perform in the future, but it is a useful marker to compare whether any significant changes are likely to have occurred since 2011. In this case, I conclude that the 2021 data shows very limited change in the relative usage of each mode of travel both in comparison with 2011 and in the ratio of Ribble Valley 07 and 08 MSOAs to the North West as a whole.
- 4.9 I therefore conclude that, without significant change in the quality of public transport services, the future residents of the Appeal Site would predominantly use the private car for travel to work. I address travel choices for public transport, as well as the measures proposed by the Appellant, in future sections.

Education

- 4.10 The TA sets out that the nearest school is St. Leonards C of E Primary School located approximately 1.2km east of the site on Whalley Road. St. Mary’s Roman Catholic School is situated 1.3km to the south in Langho village on Whalley Road. The closest secondary school is Saint Augustine’s RC High School, located on Whalley Road at Billington, approximately 2.8km east of the site. I have been advised by RVBC that the schools would have capacity to accommodate pupils from the Appeal Site. The nursery in Langho is no longer open.
- 4.11 Parents do, of course, have the ability to choose to send their children to schools other than those nearest their homes.

Other facilities

- 4.12 The following facilities would be relevant to users of the site:
- There is a Spar convenience store located approximately 1.2km to the south of the site at Portland Road. This would be suitable for day to day essentials, but facilities for larger “weekly” shops are located further afield.
 - There is a pharmacy approximately 1.1km to the south of the site on Whalley Road in Langho. There is no GP surgery or dentist in Langho.
 - Other local facilities on Whalley Road in Langho include multiple hair and beauty salons and a small sandwich shop open for takeaway until 2pm.
 - The Northcote Hotel and Restaurant is located on the A59 approximately 650m to the east of the site entrance.
 - There are limited other facilities in walking distance of the site.
- 4.13 The TA and SoC both consider the centre of the village to be the Whalley Rd/Whinnie Road junction. Whilst this is near the train station, there are limited facilities of regular use to future residents in this location. I consider a more granular analysis of distances to facilities in Langho to be required.

Conclusion

- 4.14 The purpose of this section has been to consider why people travel and where they would travel to in order to meet that need. This informs the analysis of whether genuine travel choice will exist for all users, which I present in the next section.
- 4.15 In terms of the facilities people need on a regular basis, the village of Langho provides primary education, a convenience store, and some very limited additional facilities of occasional use. The NTS highlights that education, escort education and shopping are reasonably important trip purposes in terms of why people travel, albeit the availability of higher order facilities in further afield destinations is likely to provide greater draw for many shopping trips (as well as other leisure purposes). Notwithstanding, it is important to investigate whether there will be genuine travel choice for future residents to visit the village of Langho to access these facilities. This will be investigated in the next section.
- 4.16 For employment, higher order retail, some secondary education, and many other trip purposes, future residents would be looking further afield than the village of Langho. For these trips, I will investigate the attractiveness of public transport to provide genuine travel choice.

- 4.17 I note that Mr Blair makes the point that many services and facilities can be accessed online now, and that he highlights trends in increased working from home. The NTS highlights the range of reasons why we travel, with commuting and shopping, i.e. those with the greatest potential to move online, equating to 14% and 19% of trips respectively over the day.
- 4.18 The 2021 Census showed roughly a third of the commuting trips being “working from home”, during the Covid-19 pandemic. This would only be c.5% of all trips made by future residents. This compares with 0% working from home in the 2011 Census. I appreciate this is not an in depth critique of the extent that physical trips are becoming less important, or not. However, it serves to highlight that accessing our needs online is not a silver bullet to address inherent sustainability challenges with development locations.

5. Travel Choices

5.1 This section examines the travel choices available to potential future residents to access the facilities in Langho, and public transport options to reach locations further afield. I also consider the extent to which the proposed mitigation could overcome the challenges identified. I draw upon a number of sources of industry guidance in drawing conclusions.

Industry Guidance

5.2 There is a range of industry guidance on walking distances to different facilities, and the quality, attractiveness and usability of different routes. Manual for Streets (MfS 2010) (CD6.29) sets out the principle of ‘walkable neighbourhoods’, which are typically characterised by having a range of facilities within about 10 minutes (approx. 800 metres) walking distance of residential areas. These facilities should be comfortably accessible on foot. The Chartered Institute of Highways and Transportation (CIHT) publications “Providing for Journeys on Foot” (2000) (CD6.24) & CIHT Planning for Walking (2015) (CD6.25) set out more comprehensive guidance summarised below.

Table 5-1: CIHT Suggested Walking Distances to Facilities

Category	Town Centres	Commuting / School / Sight-seeing	Elsewhere	Bus Stop	Railway Station
Desirable	200m	500m	400m	-	-
Acceptable	400m	1,000m	800m	-	-
Preferred Maximum	800m	2,000m	1,200m	400m	800m

- 5.3 The CIHT guidance sets out the 400m distance that people will walk to bus services. However, that is typically considered by professionals to be somewhat of a broad generalisation which does not account for the quality of services. For example, the Journal of Public Transportation (CD6.26) considers that for low service frequencies, i.e. 30-60 minutes, this distance may reduce to 200m or less. For higher frequency services, i.e. every 10 minutes or less, people may be willing to walk further, often between 500-800m. Passengers may walk distances of 1km or more to access rapid transit services.
- 5.4 The quality of route is also key to determining the propensity of people to use it, and therefore the extent to which it offers a genuine travel choice. This includes in relation to traffic volumes and speeds, personal safety matters such as natural surveillance, forward visibility and lighting, and mobility matters such as gradients, steps and surfacing.
- 5.5 Section 7.1 of LTN 1/20 (CD6.27) sets out that the majority of people do not feel comfortable cycling on streets which carry more than c.2,500 vehicles per day and with speeds in excess of 20mph. The same is true for lower volumes of traffic at higher speeds. This is shown in Figure 5-1.

Figure 5-1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0	Green	Green	Green	Green	Green
	2000	Green	Green	Green	Green	Green
	4000	Green	Green	Green	Yellow	Yellow
	6000+	Green	Green	Green	Yellow	Yellow
30 mph	0	Green	Green	Green	Yellow	Yellow
	2000	Green	Green	Green	Yellow	Yellow
	4000	Green	Green	Green	Yellow	Yellow
	6000+	Green	Green	Green	Yellow	Yellow
40 mph	Any	Green	Yellow	Yellow	Pink	Pink
50+ mph	Any	Green	Pink	Pink	Pink	Pink

- Provision suitable for most people
- Provision not suitable for all people and will exclude some potential users and/or have safety concerns
- Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Source: LTN 1/20, Figure 4.1.

5.6 A Quiet Lane is a designated minor rural road intended to be shared safely by motorists, pedestrians, cyclists, and horse riders. They prioritise active travel, encouraging slower traffic speeds and considerate driving on narrow, often single-track roads, without physically banning vehicles. Section 7.5 of LTN 1/20 states that the designation of Quiet Lanes may be appropriate on rural lanes where actual speeds are under 40mph, and where vehicular traffic volumes are less than 1,000 per day.

Access for All / Reduced Mobility

5.7 I refer a lot in this section to genuine travel choice for all users. There are a whole range of reasons why factors like stepped access, gradients, and concerns over personal safety and road safety could present very real barriers to personal mobility choices for individuals and families. This could include age, including young children and older people, health, disability, caring requirements, and gender. Census 2021 data indicates that approximately 30% of the ward population is aged 65 and over, compared to 18% for the UK and the North-West. Census data relating to disability indicates that 16% of the population has reduced mobility, which is broadly in line with national and regional levels.

Routes to facilities in Langho

5.8 There are three walking routes available for use from the Appeal Site to access facilities in Langho. I have used the graphic produced by Tetra Tech in the SoC Appendices to show these, reproduced as Figure 5-2. I describe the routes, including in terms of whether I consider them to be suitable for all users, and then present analysis of distances to facilities.

Figure 5-2: Routes to Facilities



Route 1 (Orange)

- 5.9 Route 1 utilises a section of existing footpath, internal to the site, which leads southeast towards Langho Railway Station and a stepped underpass, connecting to Whalley Road via Olive Bank. There is currently a stile adjacent to the rail station, which the Appellant proposes to remove. The route requires a user to navigate steps in order to access both the rail station and the route under the railway to the village. This will present challenges for those with reduced mobility as well as people with buggies and pushchairs. The underpass has a low ceiling height and feels physically constrained. Whilst users can see through the length of the underpass, visibility of what is on the other side is limited. This presents a personal safety barrier to usage for all.
- 5.10 Whilst I accept that this route will represent a genuine travel choice for some users, it will not be an attractive or genuine choice for **all** users. It will also not be the most direct route for facilities such as the Spar Convenience Store.

Route 2 (Green)

- 5.11 Route 2 is comprised of an internal pedestrian/cycle connection from the approximate centre of the site, connecting to Whitehalgh Lane to the southwest. The route continues along Whitehalgh Lane, which has no footway provision up to its junction with Moorland Road. The remainder of the route utilises existing footways along Moorland Road, up to its junction with Whalley Road. Trips to the Spar or Primary school would likely continue on Whitehalgh Lane, where footway is intermittent, rather than diverting onto Moorland Road.
- 5.12 The section of the route between the proposed pedestrian/cycle access to Moorland Road is enclosed, with no natural surveillance, and a steep gradient in places. Whitehalgh Lane is subject to the national speed limit along the majority of its length, before becoming subject to a 30mph speed limit as it enters the residential area. Street lighting is only present on the residential section.

- 5.13 Pedestrians and cyclists using Route 2 will be sharing the street with vehicles as there is no dedicated footway or cycling facilities. It is therefore important to consider the extent to which that would represent a genuine travel choice for all users. This comes down to perception of safety, both in terms of the road safety and personal safety, which links closely to mobility, traffic volumes and traffic speeds. The short section of steep gradient is also noted.
- 5.14 Unfortunately, the TA does not include survey data covering traffic volumes on Whitehalgh Lane for the full day. Nor does it include traffic speed data. Both of which are relevant to determining whether the route is suitable as a pedestrian/cycle route in accordance with LTN 1/20 and Quiet Lane guidance. This is somewhat surprising given its proposed usage.
- 5.15 Taking the traffic flows presented in the TA at the A59/Whitehalgh Lane junction, c.190-220 peak hour vehicle movements would be expected on Whitehalgh Lane in 2030 with the development in place. Without ATC data, it is challenging to accurately factor this to daily flow to compare with LTN 1/20 and Quiet Lane standards. However, a rule of thumb is daily flow is 10 x peak hour flow. This would mean that daily flow would be c.2,000 vehicles. This is well in excess of the Quiet Lane guidance of 1,000 vehicles.
- 5.16 We also do not know vehicle speeds. Whilst the national speed limit is in place, I recognise that actual speeds could be lower. Working on the assumption of traffic volumes of c.2,000 vehicles per day, LTN1/20 would require speeds to be less than 20mph for cycling on street to be suitable for all. My professional judgment and experience of walking the route on site suggests that this is unlikely to be achieved, but no data on this was presented in the TA.
- 5.17 I note mitigation proposals to introduce traffic calming and reduce the speed limit to 30mph. Drawing 4094-INFO-SK-001 diagrammatically represents the extent of proposals. This identifies that a raised table could be provided at the access point and at the Moorland Lane junction. The speed limit sign will be moved, and round top speed humps will be provided along the length. I am not aware of any designs or Road Safety Audit being undertaken on this scheme.
- 5.18 The speed reduction measures along this route are not likely to reduce the volume of traffic, and nor do I understand that to be the intention of the scheme. Therefore when considering Quiet Lane Guidance, traffic volumes will remain a barrier to usage for many potential pedestrians. If effective at reducing vehicle speeds, it may "move the dial" in terms of the route being attractive to some cyclists, but is unlikely to reduce vehicle speeds to below 20mph to remove traffic speed/volume being a barrier to most cyclists. Thus, even if this is implemented, there would still remain significant barriers to walking/cycling on Whitehalgh Lane being a genuine travel choice to all users.
- 5.19 It is also important to note that a change in speed limit requires a Traffic Regulation Order (TRO). This is a separate process to planning, and cannot be fully relied upon. This process is not fully in control of the Appellant and the LPA or LHA. Changing a speed limit from the National Speed Limit to a 30mph limit on a rural lane will involve a number of consultees in addition to the highways and planning authorities, such as the police. Introducing a 30mph limit where there is no urban frontage, as in this case, can be challenging. The reduced speed limit therefore cannot be relied upon.
- 5.20 I therefore conclude that the mitigation proposed will not be sufficiently effective to address the underlying concerns with the suitability of this route for pedestrians and cyclists. It also cannot be relied upon that the mitigation would be implemented as proposed.

Route 3 (Blue)

- 5.21 Route 3 comprises an internal pedestrian connection from the approximate centre of the site, northwards to connect with the A59 Longsight Road. The development proposals provide a footway along the south side of the A59 to tie into an existing footway to the east of the proposed bus stops. This leads to Northcote Road. The development access proposals also provide an uncontrolled crossing with tactile paving and a traffic island for the crossing by the access point, and a signalised TOUCAN crossing to the east which provides access to/from the new eastbound bus stop.
- 5.22 The route continues onto Northcote Road, through a section which has no footway provision. Footways are available to the south in the vicinity of residential properties. Northcote Road does not provide vehicle connection to the A59, and therefore has very low vehicle volumes. I am not concerned about the lack of footway on this section of the route, although it is not street-lit. The remainder of the route utilises footways on Northcote Road and Whalley Road.

Distances

- 5.23 Table 5-2 presents distances to local facilities from the centre and furthest points of the site, using each route. I have applied a RAG criteria based on the values contained within Table X: CIHT Suggested Walking Distances to Facilities. Red = Outside of Preferred Maximum; Amber = Within Preferred Maximum / Acceptable; Green = Within Desirable. For public transport facilities, anything located within the CIHT 400m Preferred Maximum is shaded Green, although it should be noted that evidence suggests that the distance people would walk for low frequency services such as those available from the site is closer to 200m.

Table 5-2: Distances to Local Facilities by Route

Route	Distance to Facility									
	Village Centre (Whalley Rd / Whinney Ln Junction)		St Mary's Primary School		SPAR (Convenience Store)		Langho Railway Station		Nearest Bus Stop (By Route)	
	Centre of Site	Furthest Site Point	Centre of Site	Furthest Site Point	Centre of Site	Furthest Site Point	Centre of Site	Furthest Site Point	Centre of Site	Furthest Site Point
Route 1	430m	730m	595m	895m	1,010m	1,310m	370m	670m	465m	765m
Route 2	1,105m	1,405m	860m	1,160m	780m	1,080m	1,150m	1,450m	750m	1,050m
Route 3	1,190m	1,490m	1,465m	1,765m	1,770m	2,070m	1,235m	1,525m	315m	600m

- 5.24 The data in Table 5-2 highlights the challenges that future residents would face accessing local facilities and public transport through active modes.
- 5.25 As set out above, Route 1 relies upon stepped access and an underpass, which presents barriers to those with reduced mobility and with buggies or pushchairs. Route 2 relies on sections of a rural lane with no footway, which is demonstrated to be a barrier to safe pedestrian and cycle usage. Whilst Route 3 is not an attractive route alongside the A59, and it would not feel safe to some groups, I can accept that it would not have the same safety and accessibility challenges faced by Routes 1 or 2.
- 5.26 This shows that almost all facilities are in excess of preferred maximum walking distances by a route without steps or mixing with traffic on Whitehalgh Lane. There is a bus stop which is less than 400m from the centre of the site, but more than 400m from some parts of the site. The primary school is within preferred maximum walking distance, approximately a mile away. It is unlikely that parents would consider any of the three routes to be suitable for an unaccompanied primary school age child, and therefore this would equate to a two mile walk, twice a day, or the use of the car.
- 5.27 The only facility within “desirable” walking distance is the rail station via route 1. The Spar Convenience Store is within preferred maximum walking distance of the centre of the Site, but not the furthest dwelling, by Route 1, and from the whole site by route 2.
- 5.28 This exercise highlights a stark “choice”. Future residents of the site would be faced with long and unattractive walking routes, some of which are inaccessible to all, where they may fear for their personal safety, in order to access a limited level of local facilities. Or they could drive by private car. This does not represent “good access by foot and cycle” (DMI2), “a genuine choice of transport modes” (NPPF para 110), or any of the requirements for access by means other than private car or providing access and addressing the needs of people with disabilities and reduced mobility, as required by the policies of the NPPF and Core Strategy.

Travel Options by Public Transport

- 5.29 I have highlighted that people needing to access significant levels of facilities and services would need to leave Langho, and therefore would have a choice between public transport and private car, including car sharing. Census data has shown that public transport mode share for journeys to work from the local area is very low.

Bus

- 5.30 Bus services are available on the A59 and on Whalley Road through Langho. I have utilised the timetables presented in Mr Blair’s Statement of Case to consider the levels of service which will be available to future residents.
- 5.31 Service 25 uses Whalley Road and travels between Clitheroe and Blackburn at an approximate frequency of one bus every two hours.
- 5.32 From the A59, Service 22 links the site with Clitheroe and Blackburn at a c.30 minute frequency. The 280 links Preston-Clitheroe-Skipton with a frequency of between 40-60minutes. Based on the LCC Highways Response, both of these services are subsidised and a contribution of £175kpa for five years has been agreed. This does not appear to be linked to any proposed improvement in service.
- 5.33 There are additional school-only services which use the A59, which I appreciate would potentially be of benefit to secondary school children from the Appeal Site.
- 5.34 As set out earlier in my Proof, the CIHT considers that people will have a preferred maximum distance of 400m to walk to a bus stop, but this is a generic value with no reference to level of service. The Journal of Public Transportation considers that for low service frequencies, i.e. 30-60 minutes, this distance may reduce to 200m or less.
- 5.35 The distance to bus stops on the A59 is within the generic 400m preferred maximum from the centre of the site, but above it from the further dwellings. The same is true for stops on Whalley Road, noting the additional accessibility issues with Routes 1 and 2. All of the services available from the site would be considered “low frequency” by the Journal of Public Transportation research, meaning that preferred maximum walking distance could reduce to 200m or lower, meaning that large proportions of the site would be outside of walking distance to a bus stop.
- 5.36 I note the proposed new stops on the A59, the upgrades to stops on Whalley Road, and the pedestrian infrastructure proposed to support people in walking to those stops. I recognise that these will benefit public transport users. I also note the significant contribution to bus services, although this does not appear to be linked to any improvement in level of service.

Rail

- 5.37 Langho Rail station accommodates one train per hour in each direction between Clitheroe and Manchester Victoria, calling at Bolton and Blackburn. Access for all is a significant drawback of the station. As stated, there is no step free access to station platforms. It is unstaffed, there are no ticket machines or toilets, there is no CCTV, and there is very limited shelter from the elements. There are currently no committed, programmed, or funded, improvements which can be relied upon to address the accessibility challenges of the station.
- 5.38 I appreciate that access to a rail station should be seen as positive from a travel choice perspective, but I would urge caution on the level of weight given to this. As set out in the Census data, rail mode share for journeys to work is very low in the area in which the site is located. Looking broader than Journey to Work data, in 2024/2025, Langho Railway Station had 36,914 entries and exits, ranking 2,146/2,586 in terms of UK station usage. This usage is trending down, -2.75% from 2023/2024 (Railwaydata.co.uk) (CD6.23). These data suggest that the station is relatively poorly used.
- 5.39 The Appellant proposes a 40 space car park to support rail usage. A technical note is appended to the Appellant's SoC evaluating the benefits of this. This technical note reports surveys of car parks at nearby stations and draws a number of conclusions based purely on observed occupancy data. The surveys show that parking at or near the nearby stations is reasonably well used and generally close to full occupancy. There are some, albeit a limited number of, available parking spaces. There is a reasonable level of spare capacity in car parks near Clitheroe station, albeit in the car parks with higher parking charges which in itself is potentially deterring or displacing some users.
- 5.40 There is no dedicated car parking at Langho Station as the former restaurant car park is no longer in use as a railway parking facility. There are limited parking restrictions on Whalley Road and nearby residential streets. On my site visit, I observed a high level of on-street parking, much of which is on pavements. It is reasonable to conclude that some of that parking is likely to be rail station users, given relatively limited other destination land uses in the vicinity. However, it is hard to be sure as some may also be associated with local residents. I also observed that, in the middle of the day, it would have been relatively easy to park on-street within walking distance of the rail station.
- 5.41 I agree with some elements of the conclusions of this study. The proposed car park would benefit existing rail users and accommodate existing demand for people to park their vehicle in Langho and use the railway. It is also reasonably likely that such a facility would make rail at Langho more attractive and potentially accommodate users who are currently using other stations. The Appellant suggests that this may reduce vehicle mileage, although it is also possible that some users may actually travel further for more convenient parking, so this may or may not be the case.
- 5.42 It is less clear cut whether rail demand is currently suppressed as a result of lack of parking availability, that provision of this car park would release this suppressed demand, and thus achieve mode shift from longer distance car journeys. It is already the case that free parking is available within walking distance of Langho Rail Station. There are multiple other influences on choice of travel between rail and car for longer distance trips, including fuel cost, congestion and destination parking availability. It may be the case that this would occur to an extent, but the evidence presented does not enable that conclusion to be reached with any confidence.
- 5.43 The technical note states that the car park would provide facilities for blue badge holders, which are not available at other stations. However, the station itself has stepped access, which will in itself be a barrier to some blue badge holders.
- 5.44 My understanding is that details on the design, maintenance and operation of the car park are yet to be determined. This is understandable at this stage of the planning process. However, I note that the LHA has stated that it will not be responsible for maintenance and operation. It will be important for personal safety matters to be incorporated into the car park design, such as lighting, CCTV, visibility, and surveillance. It will also be important for maintenance arrangements to be in place to ensure that it remains usable in the medium to long term. Resolution of these matters would need to be secured through a planning mechanism in order to have confidence in the delivery of this sustainable transport measure.
- 5.45 In conclusion, I recognise that the development benefits from access to a rail station. I also note that the proposed rail station car park will be a benefit for sustainable travel. However, I urge caution to avoid such benefits being overstated when considered in the decision-making balance.

6. Policy Matrix

- 6.1 I have demonstrated through the sections above that the Appeal Site proposals have significant shortcomings in accessibility by sustainable modes. This is predominantly by virtue of its location and the significant challenges presented in accessing day to day facilities by modes other than the private car. This is particularly the case for those with reduced mobility, families with young children, people with buggies or pushchairs, and other potentially vulnerable users. It is my professional opinion that the future residents of the development would be reliant on a private motor vehicle.
- 6.2 I have set out through the sections above the relevant policies, their requirements, and how the way this car reliance would manifest is contrary to those policies. By way of a conclusion, I present Table 6-1 below setting out the relevant policies, and my professional opinion of how the development proposals perform when considered against each.
- 6.3 It is not for me as the Transport Expert Witness to draw conclusions on the relative weight of scheme proposals against policy in the planning balance. I leave this to Planners to undertake, and I provide my professional opinion on whether scheme proposals do or do not comply with policy criteria.

Table 6-1: Policy Matrix

Policy and Wording	Comment	Do the proposals comply?
Core Strategy DMI2		
<p>New development should be located to minimise the need to travel. Also it should incorporate good access by foot and cycle and have convenient links to public transport to reduce the need for travel by private car. In general, schemes offering opportunities for more sustainable means of transport and sustainable travel improvements will be supported. Sites for potential future railway stations at Chatburn and Gisburn will be protected from inappropriate development. Major applications should always be accompanied by a comprehensive travel plan.</p>	<p>Development is not located to minimise the need to travel. There are very limited local facilities that residents would need on a daily basis in the village of Langho, and those that there are located a significant walking distance of the site. Residents would need to travel outside of the locality to meet the majority of their regular needs.</p> <p>There is not good access by foot and cycle. Walking and cycling routes to connect the site to local facilities present challenges around stepped access, personal safety, including road safety, and distances.</p> <p>Links to public transport will be convenient for some, but not for large parts of the community through distance, and/or inaccessibility, to services.</p> <p>I do not consider that the site offers its users sufficient opportunity for sustainable transport to be supported by DMI2. I recognise that improvements are being offered, but I do not consider that these are sufficient to outweigh the inherent challenges of the site location and the limited potential to address fundamental deficiencies in the walking and cycling network.</p> <p>The site is accompanied by a Travel Plan.</p>	<p>No</p>
Core Strategy DMG1		
<p>Access:</p> <ol style="list-style-type: none"> 1) Consider the potential traffic and car parking implications 2) Ensure safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated. 3) Consider the protection and enhancement of Public Rights of Way and Access. 	<p>Safe access for vehicles and traffic impact are not matters in dispute. There is a footpath which passes through the site. This will be retained, albeit with a minor diversion to accommodate drainage features.</p>	<p>The proposals do not conflict with DMG1 with regards to Access.</p>
Core Strategy DMG3: Transport and Mobility		

Policy and Wording	Comment	Do the proposals comply?
<p>THE AVAILABILITY AND ADEQUACY OF PUBLIC TRANSPORT AND ASSOCIATED INFRASTRUCTURE TO SERVE THOSE MOVING TO AND FROM THE DEVELOPMENT</p>	<p>The site benefits from public transport services in the form of the rail station and bus routes on the A59 and Whalley Road. Whilst public transport contributions are being provided, this is not tied to an improvement in service levels. Measures are proposed in terms of improving access to bus stops, although distance and quality of walking routes will be a deterrent or barrier to some potential users. There are limitations to access to Langho rail station.</p> <p>Public transport services exist, but the availability, and particularly the adequacy, of such services and infrastructure is questionable. This is borne out by existing public transport, particularly rail mode share and usage, being relatively poor. The improvements proposed provide those connections between public transport and the development that are achievable, but do not improve levels of service. Thus there is limited evidence to suggest that the development would perform materially better than the existing area.</p>	No
<p>THE RELATIONSHIP OF THE SITE TO THE PRIMARY ROUTE NETWORK AND THE STRATEGIC ROAD NETWORK.</p>	<p>I agree that the site provides access to the primary route network, which provides access to the SRN. Whilst this is compliant with this element of the policy DMG3, when considered against deficiencies in access by more sustainable modes, it serves to highlight how the balance in travel choice skews towards the private car.</p>	Yes
<p>2. THE PROVISION MADE FOR ACCESS TO THE DEVELOPMENT BY PEDESTRIAN, CYCLISTS AND THOSE WITH REDUCED MOBILITY.</p>	<p>Pedestrian and cycle access between the site and local facilities is poor. This is particularly the case for those with reduced mobility, as the routes present challenges around stepped access, personal safety, including road safety, and distances.</p>	No
<p>3. PROPOSALS WHICH PROMOTE DEVELOPMENT WITHIN EXISTING DEVELOPED AREAS OR EXTENSIONS TO THEM AT LOCATIONS WHICH ARE HIGHLY ACCESSIBLE BY MEANS OTHER THAN THE PRIVATE CAR.</p> <p>4. PROPOSALS WHICH LOCATE MAJOR GENERATORS OF TRAVEL DEMAND IN EXISTING CENTRES WHICH ARE HIGHLY ACCESSIBLE BY MEANS OTHER THAN THE PRIVATE CAR.</p>	<p>It could be argued that these elements of the policy are not applicable as the Appeal Site is not in an existing developed area or in an existing centre. It could be considered that point 3 is applicable if the site is to be an extension of an existing developed area. As set out throughout my Proof, the location has limited accessibility by means other than the private car.</p>	No or N/A depending on planner interpretation on whether the points are applicable to the development or not.

Policy and Wording	Comment	Do the proposals comply?
<p>5. PROPOSALS WHICH STRENGTHEN EXISTING TOWN AND VILLAGE CENTRES WHICH OFFER A RANGE OF EVERYDAY COMMUNITY SHOPPING AND EMPLOYMENT OPPORTUNITIES BY PROTECTING AND ENHANCING THEIR VITALITY AND VIABILITY.</p>	<p>The village of Langho offers limited everyday community shopping and employment opportunities.</p>	<p>N/A in transport terms</p>
<p>6. PROPOSALS WHICH LOCATE DEVELOPMENT IN AREAS WHICH MAINTAIN AND IMPROVE CHOICE FOR PEOPLE TO WALK, CYCLE OR CATCH PUBLIC TRANSPORT RATHER THAN DRIVE BETWEEN HOMES AND FACILITIES WHICH THEY NEED TO VISIT REGULARLY.</p>	<p>By virtue of its location and the challenges associated with the existing network, people will have limited choice to walk and cycle rather than drive.</p> <p>People's choice to catch public transport rather than drive will be relatively limited.</p>	<p>No</p>
<p>7. PROPOSALS WHICH LIMIT PARKING PROVISION FOR DEVELOPMENTS AND OTHER ON OR OFF STREET PARKING PROVISION TO DISCOURAGE RELIANCE ON THE CAR FOR WORK AND OTHER JOURNEYS WHERE THERE ARE EFFECTIVE ALTERNATIVES.</p> <p>ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO PROVIDE ADEQUATE CAR PARKING AND SERVICING SPACE IN LINE WITH CURRENTLY APPROVED STANDARDS.</p>	<p>All matters are reserved except access. Therefore parking provision is a reserved matter and does not form part of this planning application. It is reasonable to assume that parking provision would be provided in accordance with parking standards at the time of the Reserved Matters application.</p>	<p>Neutral or N/A</p>

Policy and Wording	Comment	Do the proposals comply?
<p>ALL MAJOR PROPOSALS SHOULD OFFER OPPORTUNITIES FOR INCREASED USE OF, OR THE IMPROVED PROVISION OF, BUS AND RAIL FACILITIES.</p>	<p>The provision of the station car park is positive, and I recognise improvements to bus stop facilities. There are potential challenges which will need to be addressed with the future maintenance and operation of the car park. It is debateable whether the rail station car park will release latent demand for rail travel and thereby increase use, or whether it will simply improve access for existing rail users. On the basis of the proposed station car park, and on the assumption a suitable planning mechanism will be available to ensure its effective operation in the long term, I consider the proposals comply with this element of policy.</p>	<p>Yes</p>
<p>Overall</p>	<p>The Policy directs the LPA in making decisions on development proposals to attach considerable weight to performance against a number of criteria. I have considered in terms of applicability or compliance. The policy does not then ask for an overall balance, although that would inherently be a matter for the planners and decision-makers. It is my professional opinion that the level of conflict with criteria of policy is significant, and this should be attributed appropriate weight in the planning balance. This is predominantly due to the substantial limitations in pedestrian and cycle accessibility.</p>	<p>N/A</p>
<p>NPPF</p>		

Policy and Wording	Comment	Do the proposals comply?
<p>Paragraph 89: <i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”</i></p>	<p>The circumstances under which paragraph 89 would apply are not met.</p>	<p>N/A</p>
<p>Paragraph 110: <i>“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</i></p>	<p>This highlights the importance of locations which are, or can be made sustainable, and developments which offer a genuine choice of transport modes. This site is not in a sustainable location, and the sustainable transport measures proposed have not demonstrated that the site can be made sustainable. Users of the development will not be offered a genuine choice of transport modes, particularly vulnerable users and those with reduced mobility.</p> <p>I recognise the statement that opportunities will vary between urban and rural areas, but I do not consider that the extent of the shortfall in the first part of the policy is outweighed by this.</p>	<p>No</p>

Policy and Wording	Comment	Do the proposals comply?
<p>Paragraph 115: <i>“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</i></p> <p><i>a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;</i></p> <p><i>b) safe and suitable access to the site can be achieved for all users;</i></p> <p><i>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 Code48; and</i></p> <p><i>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.”</i></p>	<p>a) It is pertinent that the criteria of Core Strategy Policy DMG3 on which Mr Blair and I are in full agreement is that the development is well linked to the Primary and Strategic Route Network. The location of the development presents significant challenges in terms of active travel usage, and whilst the development will provide a level of connection to public transport, services will not be improved. I note that sustainable transport measures are proposed, but I do not consider that this amounts to “prioritised”.</p> <p>b) I do not consider that safe and suitable access to the site can be achieved for all users. This includes vulnerable road users and those with reduced mobility, as well as those without access to a car.</p> <p>c) Reserved Matter</p> <p>d) It is common ground that the development will not give rise to significant highways capacity impacts requiring mitigation. However, the safety of pedestrian and cyclists is a significant concern. This includes in terms of there potentially being pedestrians and cyclists added to Whitehalgh Lane, and the highway safety risks with regards existing traffic, but also additional highways safety risks resulting from additional development traffic. I have highlighted my concerns with regards both the effectiveness of the proposed mitigation on Whitehalgh Lane at reducing vehicle speeds, and the deliverability of the scheme given it relies on a TRO.</p>	No
<p>Paragraph 117: <i>“Within this context, applications for development should:</i></p>	<p>a) The layout of the scheme itself is a reserved matter and is not the subject of this application. Therefore this point is to be considered between the scheme and neighbouring areas. I have highlighted the extensive deficiencies with active travel links between the scheme and neighbouring areas. There is a level of access to public transport, but existing levels of usage show that it is not “high quality”.</p> <p>b) The development does not address the needs of people with disabilities and reduced mobility in relation to all modes of transport, particularly walking.</p>	No

Policy and Wording	Comment	Do the proposals comply?
<p><i>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;</i></p> <p><i>b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;</i></p> <p><i>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;</i></p> <p><i>d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and</i></p> <p><i>e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”</i></p>	<p>c) The development layout is a reserved matter. The development proposals introduce scope for conflict between pedestrians/cyclists and vehicles on Whitehalgh Lane.</p> <p>d) Vehicular access to the site allows for servicing and emergency vehicles.</p> <p>e) Parking is a reserved matter. It is reasonable to assume that ULEV charging will be provided in line with parking standards and/or Building Regulations.</p>	

7. References

- CD5.1 Core Strategy 2008-2028, A Local Plan for Ribble Valley, Ribble Valley Borough Council.
- CD6.1 National Planning Policy Framework, December 2024.
- CD6.19 National Travel Survey (2025), Travel Purpose by Start Time and Day of the Week.
- CD6.20 Census 2011, WU03EW – Location of usual residence and place of work by method of travel to work (MSOA level).
- CD6.21 Census 2021, TS061 – Method used to travel to work.
- CD6.22 Census 2021, TS038 – Disability.
- CD6.23 Railwaydata.co.uk – Langho Station Overview.
- CD6.24 Guidelines for Providing Journeys on Foot, The Institution of Highways & Transportation (2000).
- CD6.25 Planning for Walking, CIHT (2015).
- CD6.26 Journal of Public Transportation (2024). Exploring the role of public transport service and walking route related factors to identify maximum walking distances to bus stops in the Netherlands.
- CD6.27 Cycle Infrastructure Design, Local Transport Note 1/20, Department for Transport (2020).
- CD6.28 Census 2021, TS007B – Age by broad age bands.
- CD6.29 Manual for Streets, Department for Transport.