

Land at Longsight Rd, Langho – Transport PoE Summary

Project name Land at Longsight Rd	Project number 60785314	Client Ribble Valley Borough Council	Author Chris Carter Regional Director
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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.
- 1.2 I am employed by AECOM Ltd as a Regional Director. 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.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 My evidence relates to 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. Planning Policy

- 2.1 RfR2 cites the Ribble Valley Core Strategy Key Statement DM12 and Policies DMG1 and DMG3, and the NPPF as a whole. I have significant concerns in terms of the accessibility of the site, particularly for vulnerable road users and those with reduced mobility. I consider it likely that the future users of the development will be reliant on the private car. It is important to understand what Policy says on the matter to establish that this is contrary to Policy.
- 2.2 DM12 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 this is not achieved.
- 2.3 It is clear from policy DMG3 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. My professional opinion is 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.
- 2.4 Paragraph 110 of the NPPF 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.
- 2.5 Paragraph 115 requires 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.
- 2.6 Paragraph 117 requires that development addresses the needs of people with disabilities and reduced mobility in relation to all modes of transport, which I do not consider is achieved. The use of Whitehalgh Lane by pedestrians and cyclists, as well as development traffic, introduces scope for conflicts between pedestrians, cyclists and vehicles.

3. Travel Options

Facilities and services

- 3.1 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.
- 3.2 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.

Industry Guidance

- 3.3 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) (CD6.28) 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 3-1: 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

- 3.4 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.
- 3.5 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.
- 3.6 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.
- 3.7 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.

Routes to facilities in Langho

- 3.8 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 Statement of Case to show these, reproduced as Figure 3-1, although it should be noted that the Spar and primary school are not located in the “centre of Langho” shown on the map.

Figure 3-1: Routes to Facilities



- 3.9 Route 1 (Orange) relies upon stepped access and an underpass, which presents barriers to those with reduced mobility and with buggies or pushchairs. Route 2 (Green) 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 (Blue) 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.
- 3.10 My Proof reviews distances to destinations via these routes and highlights the challenges that future residents would face accessing local facilities and public transport through active modes.
- 3.11 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.
- 3.12 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.
- 3.13 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 to those, or higher order, facilities 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

- 3.14 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. Census data has shown that public transport mode share for journeys to work from the local area is very low.

Bus

- 3.15 Bus services are available on the A59 and on Whalley Road through Langho. Service 25 uses Whalley Road and travels between Clitheroe and Blackburn at an approximate frequency of one bus every two hours.
- 3.16 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.
- 3.17 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.

Rail

- 3.18 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. Data suggests that the station is relatively poorly used.
- 3.19 The Appellant proposes a 40 space car park to support rail usage. I agree that 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 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. 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.

4. Policy Compliance

- 4.1 My Proof demonstrates 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.
- 4.2 My Proof sets out the relevant policies cited in RfR2, their requirements, and concludes that the way this car reliance would manifest is contrary to those policies. The key points are summarised below.

RVBC Core Strategy DMI2

- 4.3 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, are located a significant walking distance of the site. 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. Residents would need to travel outside of the locality to meet the majority of their regular needs.
- 4.4 Links to public transport will be convenient for some, but not for large parts of the community through distance, and/or inaccessibility, to services.
- 4.5 I do not consider that the site offers its users sufficient opportunity for sustainable transport to be supported by DMI2.

DMG3: Transport and Mobility

- 4.6 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.
- 4.7 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.
- 4.8 I agree that the site provides good vehicle 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. By virtue of its location and the challenges associated with the existing sustainable transport network, people will have limited choice to walk, cycle, or take public transport, rather than drive.

NPPF

- 4.9 Paragraph 110 highlights the importance of locations which are, or can be made sustainable, and developments which offer a genuine choice of transport modes. I do not consider this site to be in a sustainable location, and the sustainable transport measures proposed have not demonstrated that the site can be made sustainable. Users of the development, particularly vulnerable users and those with reduced mobility, will not be offered a genuine choice of transport modes.
- 4.10 With regards Paragraph 115, 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, current uptake is low and services will not be improved. Even with the sustainable transport measures that are proposed, sustainable transport modes are not “prioritised”.
- 4.11 I do not consider that safe and suitable access to the site can be achieved for all users, as required by Paragraph 115b. This includes vulnerable road users and those with reduced mobility, as well as those without access to a car.
- 4.12 Furthermore, the development does not address the needs of people with disabilities and reduced mobility in relation to all modes of transport, as required by Paragraph 117b. particularly walking. Whilst the internal layout is a reserved matter, the development proposals introduce scope for conflict between pedestrians/cyclists and vehicles on Whitehalgh Lane, which is contrary to Para 117c.