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Your ref: 21/0620
Our ref: D5/21/0620
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For the attention of Andrew Stell

Proposal: Hybrid Planning Application Comprising: 1) Full Planning Application for Construction of Signal-Controlled Junction to Fleetwood Road to North of Stadium with Connecting Spine Road and Associated Road Infrastructure, Construction of North Stand at Stadium, and Formation of Car Parking Area. 2) Outline Application (All Matters Reserved) for Erection of Building To House Indoor Community Sports Pitch Adjacent Coronation Way, and Residential Development of up to 99 Dwellings to North of New Junction

Location: Mill Farm Sports Village, Coronation Way, Medlar With Wesham

With regard to your consultation letter dated the 02 August 2021

Lancashire County Council as Local Highway Authority (LHA) is responsible for providing and maintaining a safe and reliable highway network.

These initial comments on this hybrid application are provided in advance of final comments in order to allow the developer an opportunity to address issues identified. Once further information has been provided these comments will be updated to form LCC's comprehensive statutory consultation response.

Background to the Site and previous applications

- Application 13/0655 sought approval for '*Hybrid Planning Application (Park Full/Part Outline) Full Planning application – 6,000 Capacity Football Stadium, 11,431m² Warehouse and Distribution Centre (Class B8), 1,518m² Neighbourhood Retail Store (Class A1), Internal Spine Road with access from A585 roundabout, associated parking, landscaping, drainage and infrastructure. Outline Planning Application (Access sought with other matters reserved) – 8 x Outdoor Floodlit All Weather Pitches, Changing Room Block, Petrol Filling Station, 785m² Non-Food Bulky Goods Retail Unit (Class A1), Hotel (Class C1), Pub/Restaurant (Class A4), Drive Thru Restaurant (Class A3/A5), 492 Space Overflow Car Park and the formation of a Surface Water Attenuation Pond.*' The application was granted by Fylde Borough Council 17 February 2015.

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- Application ref 16/0621, dated 15 August 2016, sought approval of details pursuant to conditions of planning permission Ref 13/0655. Included in this were Condition 33 (Car Park Management Plan) and Condition 34 (Event Management Strategy).
- Discharge of these conditions was refused by notice dated 29 May 2018 and the decision subsequently appealed under section 78 of the Town and Country Planning Act 1990. The appeal was dismissed insofar as it related to the car parking management strategy and event management arrangements. The Local Highway Authority, Lancashire County Council, provided evidence pertaining to the car parking provision attached to 13/0655 and the impact the lack of provision, and breach of conditions attached the planning permission, were having on highway safety and operation.
- As of the date of this response the Car Parking Management Strategy Condition has not yet been discharged and highway safety and operation around Mill Farm **on match days remains a substantial concern.**
- **An application for further development must demonstrate that sufficient parking is being provided.** The stadium has a shortfall in parking and demonstrating that adequate parking is provided for existing and proposed uses on the site is essential. The impact that present car parking management and provision is having on highway safety and congestion is regarded as severe in policy terms. This must be overcome, by way of an adequate CPMS and adequate parking provision.

Appeal Decision

The decision notice for Appeal APP/M2325/W/18/3208986 made a number of relevant comments.

14. I appreciate that the ratio of 1 space per 8.8 spectators was accepted by the Council and the highway authority at the time that the hybrid planning permission was being considered as the most reasonable estimate of the immediate and short term requirements of the stadium. However, it seems to me that, on the basis of the evidence from the surveys referred to above and irrespective of whether or not the actual and/or long term level of car parking available on-site is as presented in the CPMS, the overall level of on-site parking provision intended to be provided for in the CPMS is inadequate. Consequently, it is likely to result in delays on the highway network and lead to increased pressure for parking on surrounding streets to the detriment of both highway safety and the living conditions of nearby residents.

15. This is supported by the findings of the survey undertaken by the highway authority for the Salford match referred to above where all of the available on-site parking was used. Furthermore, whilst I appreciate that the provision of the overspill parking referred to above was not a requirement of the original planning permission by virtue of either a condition or a S106 obligation there is no substantive evidence to explain the position taken within the CPMS that there is now no intention to provide this. The evidence submitted by the Council by way of the surveys undertaken by the highway authority, would in my view appear to support the need for such parking provision.

The LHA is of the opinion the overspill car park remains absolutely necessary (or sufficient car parking should be provided within the site to satisfy needs and the highway authority) and this position was supported at this Appeal.

Development Proposal

- The proposal is a hybrid planning application comprising:
 - 1) full planning application for construction of signal-controlled junction to Fleetwood Road to north of stadium with connecting spine road and associated road infrastructure, construction of north stand at stadium, and formation of car parking area.
 - 2) outline application (all matters reserved) for erection of building to house indoor community sports pitch adjacent coronation way, and residential development of up to 99 dwellings to north of new junction.
- It should be noted that the construction of the North Stand is understood to have commenced prior to permission being granted. This has resulted in a loss of parking which is concerning given the existing safety issues already raised as a consequence of a parking shortfall and tested at appeal (as highlighted above).

Full Planning Application: Proposed Junction

- The principle of the provision of a new junction on Fleetwood Road could be considered acceptable and should support access/egress from this large cul-de-sac. It could allow for a level of circulation and a level of congestion relief at the main roundabout access at peak times. This must not be to the detriment of the main line A585 traffic (any internal road would not be adopted and therefore remain private, as its purpose is to satisfy the wider commercial development).
- The A585 Fleetwood Road is a principal corridor and as such proposals should seek to minimise delay. A northbound left-turn lane into the proposed new access must be provided to help reduce delay to the mainline A585. **The access proposals as presented in Proposed Masterplan (DRG NO: 6513_L003) are not acceptable and a revised plan including left turn provision should be submitted by the applicant.** This may require the junction to be relocated further north where it may be more easily accommodated.

Outline Application: All Matters Reserved

- The application includes outline for a proposed residential development, with all matters reserved, including Access. Some assessment is enclosed in the transport assessment. Until Access is applied for comments on this proposal are reserved.
- The outline proposal for residential if granted could take the overflow car park off the table permanently. For obvious reasons the failure to deliver the overflow car park would not be supported.
- It is noted that the Enabling Development Report prepared by Savills assumes that the proposed access roads are acceptable forms of access and will be

adopted highways maintainable at public expense. For the avoidance of doubt, Lancashire County Council will not be adopting Coronation Way or any part within the site. The construction of Coronation Way was not to the required standard, and there are substantial issues with parking, obstruction, and potential safety issues. Similarly, due to the location of the access for the outline application (residential) site being proposed from the new section of access from the A585 to Coronation Way, the roads within the proposed residential development would not be adoptable as they would not be connected to the adopted highway.

- It is also important to ensure that steps are taken/measures delivered to ensure residents would not face the parking and amenity/access issues that the immediate and surrounding area, such as Sanderling Way, experience on match days.
- Assuming all matters could be overcome, and residential development was to come forward on this site as proposed, there would be merit if the residential area was gated. This would ensure that non-residential parking is prevented during matches.

Parking Provision and Management

The table below sets out the car parking provision at present, taken from the LHA's Statement of Case from the Appeal.

Table: Parking provision prior to this application and north stand construction commencing

Car Park	Total Spaces on site	Match Day Provision	DTP Transport Assessment 2021 Proposal (not agreed with LCC)	Comments
North of Stadium	65	45 (+20 Hotel)	197 (+20 Hotel)	The 65 included 10 disabled parking spaces. All these spaces appear to have been lost due to construction of North Stand commencing in advance of permission being granted. Masterplan shows 189 spaces North of Stadium, 20 of which would be for the hotel. LCC does not agree with the 2021 Proposal parking level suggested
Adjacent to 3G pitches (Hockey)	130	70 (+60 Hockey)	103 (+50 Hockey)	The condition requiring these to be available has been consistently breached. Therefore, the Transport Consultant has now allocated 50 for the 3G pitches, though stated that no additional parking will be generated by the indoor 3G pitch during matches. This is not accepted by the LHA. LCC does not agree with the 2021 Proposal parking level suggested

Rear of East Stand	60	60	40	Designated for staff, players and officials. This parking allocation demonstrates a failure of the Travel Plan and this staff/player/official allocation was not indicated in the original TA. LCC does not agree with the 2021 Proposal parking level suggested
West of Aldi	95	95	0	Removed as part of this proposal.
Trilanco	102	102	102	Long term availability needs to be established and controlled in the CPMS.
Coronation Way	40	40	40	Parking on Coronation Way has been largely at the northern end near what is now proposed to be a residential site. It is not clear if this will be an access.
Total		358	482	LCC does not agree with the 2021 Proposal parking level total as suggested

The Transport Assessment submitted indicates:

- The construction of the North Stand will provide 1800-person capacity, increasing the existing current capacity; this is expected to allow the 6000-person capacity of the stadium to be realised, subject to licensing.
- Removal of the 95 spaces west of Aldi (*Please note that Table 4.1 Car Park does not correspond with Figure 3.2 car park diagram*) – Referred to as South Stand.
- The land previously identified for the overflow car park is proposed for residential development and there is no intention to bring forward the overflow car park.
- New development is intended – with construction of a new development – indoor 3G pitches.
- Total parking contained within the Transport Assessment suggests a total of 482 spaces. This does not correspond with the masterplan. LCC does not agree with the 2021 Proposal parking level total as suggested.

Interim comments prior to full comments being provided:

- **Parking provision should be undertaken by way of robust analysis. The proposed levels of parking provision are not acceptable.** There is inadequate parking on site. Any change to this requires this analysis.
- The robust analysis should also demonstrate the amount of required disabled spaces is appropriately calculated for all uses within the site. Whilst proportionally disabled parking seems to have reasonable provision, this is only the case because overall on-site parking provision is low.
- **Provision of overall parking should be such that the impact on the surrounding area is minimised so far as possible.** Provision and Management need to be properly considered in tandem. The priority car parking spaces for

shared vehicles in the Travel Plan, for example, is sensible, but requires suitable management and monitoring.

- **The original hybrid application provided for an overflow car park of 492 spaces.** This has not been delivered and no justification has been provided to explain this. Adequate justification is required, there is clearly a shortage of parking on site at present.
- **New proposals should meet their own parking requirements.** The proposed indoor 3G football pitch is stated to have no parking demand during match days. As breach of the condition (parking availability) associated with the Hockey pitches parking area was observed, and enforceability has been a continual issue for the LPA, this approach is not supported. A car parking accumulation assessment is required for the proposed development and the provision must be available above and beyond that for supporters.
- **Parking provision should not obstruct or delay other movements. Coronation Way operation is having a significant detrimental effect extending back on to the adopted highway.** Further development that is not managed appropriately will exacerbate this. The marked-out provision along Coronation Way is obstructive and not supported – as vehicles manoeuvre to park it will cause delay in the site circulation and is unlikely to satisfy two-way movement for all vehicle types without conflict. An additional junction will increase traffic flow in both directions through the site and therefore the main route on Coronation Way between the accesses should be clear of parking and obstruction to enable flow and circulation. There is also an access to the proposed residential development next to the 3G pitches and it is unclear whether or not this is intended for use. The use of this access reduces the available parking on Coronation Way.
- **Charging for parking, with a site staff stopping vehicles on the spine road, is exacerbating issues back on to the adopted highway.** The obstruction of Coronation Way to facilitate charging for parking is not supported. The current approach to charging should be reviewed and amended in order to mitigate the damage that the current regime has had on highway safety and congestion, and local residential amenity.
- **Parking provision should be within the control of the applicant,** The Trilanco parking cannot be guaranteed to always be available. The 3G pitches are regularly used during match times breaching the imposed planning condition. This therefore, presents concerns about the availability of both of these areas for supporter parking. These are not discounted from the assessment in the '2021 Proposal'. There needs to be certainty around parking availability.
- **The construction of the North Stand has commenced without permission.** This has resulted in an immediate loss of parking. In addition, it is unclear if there is any disabled parking provision at present due to this and what the impact of this has been on overall levels of available parking.

Comments on a new CPMS have not been provided in these Interim comments and will be provided separately. It has been agreed with the LPA that if this application

and all matters could be agreed, then this could have a significant role in helping to resolve the CPMS issues.

Layout

It would be preferable to discuss this directly with the applicant's consultant. Here are some initial comments on the layout, these are not exhaustive.

- Adjacent to the Hockey pitches is a second possible access to the proposed residential site. It is unclear if this will come forward, but it would reduce available parking on Coronation Way if this is the case.
- The parking and routing around the proposed Indoor 3G pitch requires further consideration. Depending on the nature of the disability, some disabled vehicles require a 3m space behind them and there is some conflict here between spaces should that be the case. This would also require obstruction of the route around the building. These spaces could be better positioned, away from the bend with poor visibility. There is scope for conflict between users in this location. The access and route for these users to the Indoor 3G pitch is unclear.
- A one-way system around the proposed 3G pitch may cause issues with congestion backing on whilst vehicles manoeuvre. In periods of high demand this could affect the circulation in the site. This requires further consideration by the applicant.

Transport Assessment

Traffic Modelling

- I will leave the majority of comments on the more technical matters until the matters raised relating to parking have been resolved. Notwithstanding this, I have some comments I wish to make at this stage.

Assessment Scenarios

- 5 years is the standard assessment post submission this proposal is in line with this;
- The assessment scenarios Weekday AM Peak Hour, Weekday PM Peak Hour (Match Day) and Saturday Peak Hour (Match Day) are acceptable. There are issues with what these show, however.

Comments on TA Figures

- Original TA Figures (Cameron Rose Associates Transport Assessment, Fig 6.2, AFC Fylde Football Assignment) suggested Saturday peak hour traffic would be 151 two-way movements. In the final consultation comments, LCC stated: *'For the avoidance of doubt, LCC does not accept the use of the original TA, its conclusions or the assumptions/analysis contained within, therefore this*

documentation should not be used as a basis for assessment of any future proposals that impact on the local highway network.'

- Notwithstanding the above much of **the information used is significantly out of date at this point**. The site would benefit from a fresh analysis, with adjustments to account for the impact of Covid-19. The use of information from 2009 is not appropriate and is not reliable. Some of the information may need to be used but this needs to be discussed with the LHA.
- The site has been in operation for a number of years and therefore analysis and assessment should consider actual observed operation (site movements and parking, this detail to be agreed with LHA)
- Trips and parking levels have been consistently understated. There is a significant degree of **constrained demand** due to the consistent shortfall in parking provision on site (and the subsequent off-site parking). The peak is substantially different from the 2026 base + peak development flows.
- The outputs of this data are unrealistic - suggesting that the local highway network is working acceptably during Saturday Peak - this is not the case when compared with observations.

Assumptions

- Assumptions that underpin the modelling should be listed under one paragraph at the beginning of the modelling section. Where using previous material it should include all relevant assumptions made in that reference material so as to ensure there is consistency between the assumptions and these are clear.
- The Saturday growth has a lot of factors that influence it and should be discussed with LCC.
- The level of parking provided does not appear to have been undertaken by any form of accumulation assessment, nor with reference to LCC analysis of demand. The figures used and the final conclusion as to traffic flows are not considered reasonable.

Outputs

- The outputs of the models are not currently acceptable, in their entirety. The models are not reflective of that observed. For example, 2026 Base + Com Dev + Dev shows for the roundabout, the maximum delay for any arm being 5.90 seconds, and the maximum queue in PCUs being 1.1. Clearly this is not at all realistic when considered against that presented by LCC in the Appeal.
- The approach taken is not acceptable. This needs to be discussed with LCC as a matter of priority so that the analysis can take place to determine what the proposed impact of the development will actually be.

The observed situation is far different to that presented in the modelling. It is appreciated there is a great deal of difficulty in modelling a situation such as this where the demand is constrained. It is suggested that another meeting is held to discuss these issues and how best they can be progressed by the applicant.

Conclusion

These interim comments provide outline some of the key issues. LCC wishes to work with the applicant to resolve the outstanding matters to the satisfaction of all parties. It remains the case that the determination of the appeal is relevant and since that point there does not appear to have been a change in direction.

The current development has not met its obligations in terms of mitigating its impact on the highway network and has an ongoing severe impact in policy terms. The net effect of the parking changes is detrimental to an already concerning level of risk to road users, and the wider impacts of the proposal in terms of exacerbating already present issues needs to be addressed.

I consider that further information and accurate evidence is required from the applicant in order for the LHA to fully understand the impacts of these proposals.

Therefore, LCC Highways' position at this time is to recommend that the LPA does not take this application to committee for a decision until all outstanding information is presented in line with the that set out in these statutory comments. If the applicant does not wish to provide further information the highway authority recommend that the application must be refused due to lack of information.

I consider that a meeting to discuss all of the above would be the most effective way of moving matters forward.

Yours sincerely
Dan Spencer
Highway Development Support