Central Lancashire Local Plan. Matter 5 - Housing Allocations Chorley

Examination Statement regarding Site HS 2.36 - Land Adjacent to Delph Way, Whittle Le Woods.

1. Introduction and Personal Information

This submission is made by William Bennett Taylor [redacted] It is on behalf of the writer and also on behalf of several other residents of Delph Way and Cross Keys Drive, on whose behalf I speak today. These are: Paul Blackmore, Rosemary Taylor, Lynette Daniels, Sheena Johnson, Gary Sutton and Ken McVie. All of these persons submitted Regulation 19 statements and have confirmed they wish me to represent their views. Other residents have expressed views during the process but have not formally submitted. The writer has attempted to reflect all of the views expressed to him fairly.

My family and I have been resident of [redacted] for some 25 years since the properties were first built. My educational background includes an honours degree in Town and Country Planning and a Post-Graduate Diploma in Housing Policy and Practice. Prior to retirement in 2019 I spent my whole working life in affordable housing and social enterprise. This included almost 30 years working in housing development and asset management, mostly for housing associations, including in roles from Development Officer up to Executive Director (Development) for large regional and national social landlords (e.g. Riverside Group, Places for People, Sanctuary) . For the last 10 years of my career I was MD of [redacted] providing services and advice to Registered Social Landlords, consultancy firms and others. I have been involved in delivering thousands of homes for rent and sale on sites of varying type throughout the country as well as leading some of the largest procurement and asset management initiatives in the sector. I am not 'anti-development' and realise that providing the right mix of housing types and tenures in the right locations is essential to meet the current and future challenges of homelessness, stock quality and population changes.

2. Question 5.2 - Detailed Submission

2.1 Site Constraints - Means of Access and Egress to proposed site

The Site Analysis for Site HS2.36 in the consultation document states (pp204-5) *'Suitable vehicular access should be possible from Delph Way / Cross Keys Drive'*. As illustrated in the Plans at Appendix 1A and 1B, these residential roads are a mix of three shared surface 'arms' and one access road with footways on each side. The shared surfaces provide the three southern-most access points to the proposed site and the access road provides the most northern access. All four access points have to cross private land between their terminal turning heads and the proposed site.

The shared surfaces have a width of between 5.7m and 4.6m. This is BELOW the recommended 6m width in the Essex Design Guide Street Type Table (2018, v3). The roads are further constrained by parked cars as the in-curtilage provision is insufficient for the current number of vehicles. The Essex guide indicates a maximum number of dwellings to be served from a 6m shared surface at 25, in a cul de sac of no more than 125m length. Localised narrowing is permitted, but the overall width should be 6m. This is not achieved on Delph Way OR Cross Keys Drive.

These constraints mean that these shared surface minor access roads are not suitable for accessing further development on a scale that is envisaged in the site analysis as it stands.

Even with no other constraints, these three minor access shared surfaces are only capable of serving an MAXIMUM additional 20, 19 and 10 properties each (taken from the northern to the southern shared surface spurs). This would leave a MINIMUM of 53 properties to be accessed from the northernmost spur if the potential for 102 properties on the site is to be achieved. We set out below reasons why this is not achievable.

The southern-most shared surface is approx. 120m long, measured along the centre line from the rumble strip at its start to the boundary of the proposed site. The maximum length of this road type recommended in the Street Type Table is 125m. This means there is very little scope to extend it, even for a few more properties. The cost of doing this would be totally uneconomic.

It should be noted that the second to southern-most spur is separated from the proposed site by a children's play area. The 2 most northern spurs have significant areas of landscaped open space and private driveways between the terminals and the proposed site.

2.2 Site Constraints – Junction with Chorley Old Road and beyond.

Cross Keys Drive and Delph Way, along with Carwood Lane, share a junction with the local feeder road of Chorley Old Road. This is a longstanding route (so much so that it formed part of the main north-south stagecoach route before the advent of motorised traffic). It is more narrow than modern standards would specify for a road of its usage. The junction itself is 'skewed' with a building to the north and a wall to the south constraining vision lines. The houses opposite have limited parking and the property immediately at the north of the junction has no off street parking, meaning parked vehicles often constrain the road width and the visibility of both carriageways.

Chorley Old Road itself is lined with residential and some commercial properties, many of which have no in-curtilage parking and the issue on constrained traffic flow due to parked vehicles is a long standing local problem. It is also a route for delivery vehicles for local businesses and an hourly bus route. To the south of the junction it leads to a tight bend on a steep slope with very limited visibility and very narrow footways (See Appendix 2) . The topography at this point means improvement to the road width here is not possible. To the north the issues of parked cars become more acute, and the next feed towards the A6 is Cow Well Lane which is very steep, with a constrained junction compounded by parking for adjacent commercial premises and narrow / single side footways on Cow Well Lane itself. These issues continue all the way along Chorley Old Road and are further illustrated in Appendix 2.

2.3 Site Constraints / Yield - Impact of Extra Traffic.

The 77 properties currently built on Delph Way and Cross Keys Drive using the Chorley Old Road junction currently generate a peak flow of approx. between 33 and 48 movements per hour, as surveyed in early November 2025. This is consistent with a previous survey carried out in 2021 when the peak flow was between 27 and 57 movements per hour. The construction of another 102 properties with no other option but to use this junction can reasonably be assumed to generate traffic at the same rate For an extra 132% of dwellings, the traffic one might reasonably assume at total peak is between 76 and 111 movements per hour. This is more than the standard traffic models used

by developers to calculate flows indicate, which is a sign that either the models are not suitable or that the particular location-specific issues at this site mean that extra traffic is generated.

The impact of the extra traffic on the existing roads within the estate, the junction at Chorley old Road and the already constrained means of accessing the wider road system will be significant. **It is submitted that the issues caused by so much extra traffic in this locality from so many extra properties has not been taken into account in the evaluation of this, and other, sites.**

These issues have been raised at several consultation events and in submissions throughout the plan preparation process. They have never been specifically addressed and this causes concern that the process to 'consult' is not delivering any actions by the Planning and Highways Authorities to indicate that the views and lived experience of the residents are having any effect in the process. There is a significant danger that, unless these and other issues are addressed in a meaningful way the view will develop that the consultation process is just a sham to 'tick boxes' rather than a genuine effort to engage. At the very least, a reasoned justification for not accepting our points needs to be provided.

2.4 Site Constraints / Yield - Topography

The site slopes steeply downwards from North West to South East. The gradients are illustrated on the plans in Appendix1. The gradients vary from 10-16% from the northern-most access point. This is, following the logic in section 2.2 above, the access point that would have to serve most of the proposed new properties. A steep slope downwards which is the only means of access and egress for a cul-de-sac is contrary to all good planning practice. Already in poor winter weather the much slighter and shorter slope adjacent to 27-29 Delph Way causes traffic problems as cars struggle to cope with ice or snow. We locals grit the area which eases the issue for the 16 households which need to use it, but the issues that would be caused for more than 50 households needing to use the northernmost access road dictated by this proposal would be very significant. The gradient from the southernmost access point to the boundary of the site is 15%.

The density of dwellings assumed to achieve the target yield of 102 dwellings is 26 per hectare. This is significantly higher than any of the other local sites - HS2.34 and HS2.37 off Hill Top Lane have proposed densities of 11 and 16 dwellings per hectare respectively at a similar stage of the planning process. The site at Town Lane (HS2.35) which is much more advanced and has a site layout approved within the development control process at a density of 15 dwellings per hectare. Why is the subject site assessed as being capable of accommodating almost twice the density of the other sites? **The Local Planning Authority has failed to explain this discrepancy which is especially concerning as the topography of this site is more problematic for housing density than any of these other examples.**

One possible solution for this issue would be to access some or all of the proposed site from the forthcoming Town Lane development on to the west of the Delph Way site via a bridge over the river Lostock. The Town Lane site is currently in the planning stage and a small adjustment to the road layout (intended to be adopted) would enable this to be achieved.

Another possible solution would be to reduce the number of properties proposed for the Delph Way site, but this would still result in any of the new properties being accessed in a way that is manifestly unsatisfactory.

It is submitted that the topographical constraints of the site mean that accessing the proposed properties from Delph Way and Cross Keys Drive is very unsatisfactory. Alternative access via the proposed Town Lane site is one possible solution, or reducing the number of properties proposed would reduce, but not eliminate the issue. Again, this possible solution has been suggested at several stages during the Plan Consultation but not taken forward. If the Planning/Highways Authority now think it is too late to consider, they MUST answer the question of why it was not reviewed at a stage when a 'joint site' solution could have been possible.

3. **Concluding Remarks**

It the site IS to be proposed for development within the final plan, the constraints detailed above need to be taken into account. This will lead to the potential capacity being reduced significantly, and / or the site being accessed other than via Delph Way / Cross Keys Drive. A reduction in the site density would also be more consistent with the other sites proposed within the Plan.

Thus far, the Local Planning Authority and Highways Authority have responded to any concerns with the mantra that 'the detail will be sorted out at a later stage' . This is not satisfactory, because the inclusion of a site with an unrealistic target number of dwellings for it is falsely contributing to the meeting of the overall unit targets for new housing. It also sets an 'expectation' for a potential developer that will be unrealistic.

It is submitted that the allocation of this site within the Central Lancashire Local Plan for a capacity of 102 new dwellings is not 'sound'. We would respectfully request that it be either omitted completely or radically reviewed in terms of yield and means of access prior to the Plan's adoption.

Thankyou for the opportunity to make this submission.

William B Taylor.

Attached:

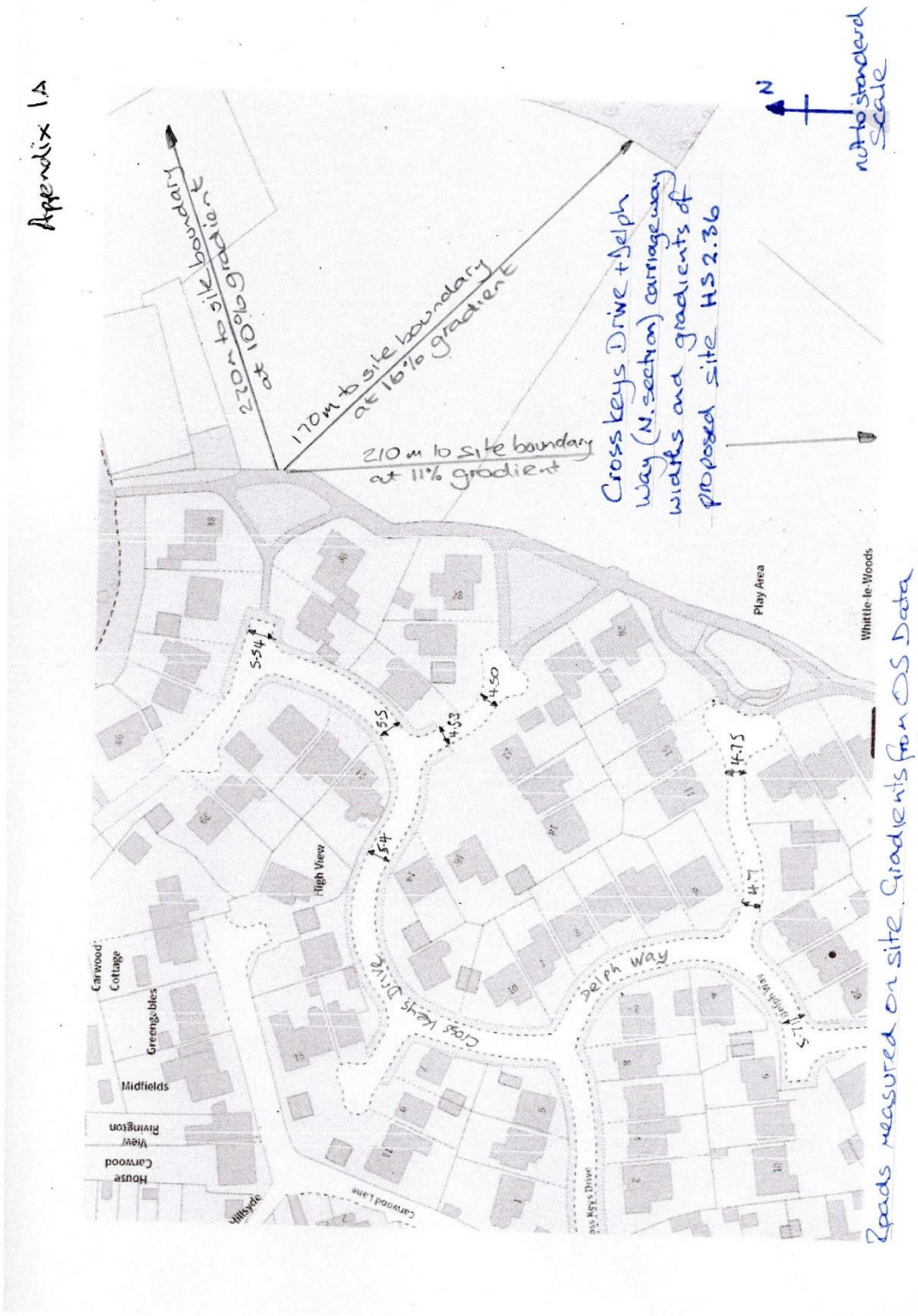
Appendix 1A – Plan of Cross Keys Drive / Delph Way, Northern Part

Appendix 1B - Plan of Cross Keys Drive / Delph Way, Southern Part

Appendix 2 – Photos of various locations relating to wider access / egress.

Detailed breakdown of traffic survey quoted can be supplied if required.

Appendix 1A


Appendix 1A
270m to site boundary at 10% gradient
170m to site boundary at 16% gradient
210m to site boundary at 11% gradient
Cross keys Drive + Delph Way (N. section) carriageway widths and gradients of proposed site HS2.36
N
not to standard scale
Roads measured on site. Gradients from OS Data
Play Area
Whittle-le-Woods
Delph Way
Cross Keys Drive
High View
Carwood Cottage
Greengables
Midfields
House
Carwood
View
Riviington
Hillside
Carwood Lane
5.54
5.55
4.53
4.50
5.4
4.75
4.7
5.15

Appendix 1B


Appendix 1B
Play Area
Whittle-le-Woods
Delph Way (S. section)
carriageway widths +
gradient of S. part of
proposed site HS2 Ph2b
not to standard scale
60m to site boundary at 15% gradient
Roads measured on site. Gradients from OS data.
Delph Way
CARRIAGEWAY CENTRE LINE
8.9
4.9
4.54
5.7
4.95
4.86
11
5
4
9
23
35
37
34

Appendix 2

Above - Photo 1 – Junction of Carwood Lane and Chorley Old Rd – all traffic from Delph Way and Cross Keys Drive, as well as Carwood Lane, has to use this access point.

Above – Photo 2 – Constrained steep bend just south of Photo 1

Above – Photo 3 – Chorley Old Roda constrained by parking issues which will be made worse if / when prohibition on pavement parking is enforced.

Above - Photo 4 – Access to from Chorley Old Road to Cow Well Lane on left. The number of parked cars is much higher when the takeaway on the right is open.

Above - Photo 5 – Significant parking constraint along Chorley Old Rd to the north of Cow Well Lane.

Above – Photo 6 – Mill Lane (to Left) provides access to A6 close to Co-op store, but again, significant on-road parking issues.